TSD File Inventory Index

Date: hushw 7,2018
Initial: Um Hecoo

Facility Name: Men Pelled Pondus	Ts,	Correy (One Telder Site)	
Facility Identification Number: OHD 60	44	57222	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	j
A.2 Part A / Interim Status	T	.1 Correspondence	٨
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	1 1	C.1 Compliance - (Inspection Reports)	X
.3 Part A Application and Amendments	1	C.2 Compliance/Enforcement	\(\sqrt{\chi}
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	1
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	V
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A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
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A.5 Ambient Air Monitoring	_	.1 RFI Correspondence	1
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.2 Reports		.3 RFI Program Reports and Oversight	
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Total -1.

.6 RFI QAPP Correspondence	.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater	D.5 Corrective Action/Enforcement	
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.9 Interim Measures Correspondence	.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations	
.3 Corrective Action/Remediation Study	.1 Forms/Checklists	
.1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures	.1 Correspondence	
.3 CMS Workplan	.2 Reports	
.4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization	G.1 Risk Assessment	
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.2 CMI Workplan	.5 Permitting	1
.3 CMI Program Reports and Oversight	.6 Corrective Action Remediation Study	1
.4 CMI Draft/Final Reports	.7 Corrective Action/Remediation Implementation	1
.5 CMI QAPP	8 Endangered Species Act	
.6 CMI QAPP Correspondence	.9 Environmental Justice	
		\dashv

Note: Transi	mittal	Letter	to Be	Included	with	Reports
Comments:	Que	Jal.	/dla/	setu	ŧ	

RECEIVED JUL 13 1993 WMO RCRA. RECORD CENTER

George V. Voinovich
Governor
Donald R. Schregardus
Director

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 FAX (614) 644-2329

June 2, 1993

Alcan Rolled Products Company Attn: G. C. Jaros P.O. Box 1151 Warren, OH 44482

RE: EPA ID#: OHD004457222

LOCATION of INSTALLATION: 390 Griswold St NE Warren, OH 44483

In response to your request of March 1993 the following information has been updated:

Contact: G. C. Jaros (216)841-3205

Name: Alcan Rolled Products Co

(formerly listed as Alcan Sheet and Plate)

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau, Manager

Data Management Section

Division of Hazardous Waste Management

Thomas E. Crepeau

TEC/bab

cc: U.S. EPA, Region V Ohio EPA District Office



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY REGION V

230 SOUTH DEARBORN ST CHICAGO, ILLINOIS 60604

JAN 28 1983

Mr. Albert E. Hinsdale Plant Engineer Alcan Aluminum Corp., Sheet and Plate Div. P. O. Box 1151 Warren, Ohio 44482

RE: Interim Status Acknowledgement

USEPA ID No. 0HD004457222

FACILITY NAME: Alcan Aluminum Corp., Sheet and Plate Div.

Dear Mr. Hinsdale:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: Dennis D. Foley, Vice President & Tech. Officer, Alcan Sheet & Plate

10/2/0°



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports cluded on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

OHDOO4457222 REACKNOWLEDGEMENT

ALCAN SHEET & PLATE

PO BOX 1151

WARREN

OH 44482

INSTALLATION ADDRESS

390 GRISWOLD ST INE

WARREN

OH 44483

EPA Form 8700-12B (4-80)

09/29/81

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X. CERTIFICATION						
I certify under penalty attached documents, and I believe that the submit mitting false information	d that based on nated information i	ly inquiry of those indi	viduals immediatel mplete. I am awar	ly responsible for ol	taining the informati	ion.
SIGNATURE //		NAME & OFFI	CIAL TITLE (type or	r print)	DATE SIGNED	
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EPA Form 8700-12 (6-80) REVERSE

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And the second s

Alcan Rolled Products Company

Mailing Address: Box 1151, Warren, Ohio 44483-2738

Mailing Address: Box 1151, Warren, Ohio 44482-1151. Telephone: 216/841-3337

October 16, 1992

OFFICE OF RCRA Waste Management Division U.S. EPA, REGION V.

Francene Harris USEPA, Region 5 OH/MN Technical Enforcement Section 77 West Jackson Boulevard Chicago, Il 60604-3590

Dear Ms. Harris,

I understand that Mr. Dale Alflen has contacted you concerning our part A permit status, and the audit that is scheduled for our facility on Tuesday, October 27.

Apparently, there has been an oversight on our behalf. Because we are only a generator of hazardous waste, and not a storage, treatment, or disposal facility, we will be filing a formal letter to withdraw our RCRA part A permit application. I understand that because the permit application has never been withdrawn you may wish to conduct an inspection on our facility. Due to the nature of this audit, however, I am concerned that our facility is not one, in which, you would want to audit.

Currently, we are planning to meet with Mr. Jack Brunner and Ms. Kristine Kruk, of PRC Environmental Management, Inc., on October 27. If, however, you agree that, due to the nature of the audit, our facility is not one that you want to look at, please give me a call. I can reached at (216) 841-3205.

Sincerely,

George (Mick) Jaros

Plant Engineer

GCJ/da

cc K. M. Pierard - USEPA

P. S. Segretto - Cleveland

S. R. Dubois - Oswego

W. M. Bell - Warren

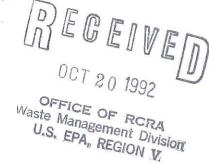
D. T. Alflen - Warren

Alcan Rolled Products Company



390 Griswold Street, N.E., Warren, Ohio 44483-2738
Mailing Address: Box 1151, Warren, Ohio 44482-1151. Telephone: 216/841-3331

October 16, 1992



Francene Harris USEPA, Region 5 OH/MN Technical Enforcement Section 77 West Jackson Boulevard Chicago, II 60604-3590

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Sincerely,

George (Mick) Jaros

Plant Engineer

GCJ/da

cc K. M. Pierard - USEPA

P. S. Segretto - Cleveland

S. R. Dubois - Oswego

W. M. Bell - Warren

D. T. Alflen - Warren

5184-13

D.D. Foley, Vice President and Technical Officer Alcan Sheet and Plate Division-Aluminum Corporation P.O. Sox 1151 Harren. Ohio 44482

RE: Withdrawal of Part A

FACILITY MAME: Alcan Sheet and Plate Div.

Alcan Aluminum Corporation

U.S. EPA ID #: OND 004-457-222'

Dear Mr. Foley:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief Weste Management Branch

cc: Tom Carlisle, Obio EPA Cheryl Raiser, Obio EPA Environmental Engineer

> A.E. Hinsdale, Plant Engineer

Alcan Sheet and Plate

Division of Alcan Aluminum Corporation



390 Griswold Street, N.E., Warren, Ohio 44483 Mailing Address: Box 1151, Warren, Ohio 44482. Telephone: 216/841-3331

September 30, 1983

OHD ONY 457 ZZZ

Christine M. Frazier
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, OH 44087-1969

Dear Ms. Frazier:

This letter is intended to notify you that in accordance with 40 CFR 265.176 and OAC Section 3745-56-56, we have relocated our hazardous waste facility at least 15 meters (50 feet) from the plant's property line.

If you have any questions, please call me at (216) 841-3249.

Yours truly,

Donzell Green

DG: jmm

cc:

A. E. Hinsdale

P. L. Morris

T. H. Rowley

K. Homer: U.S. EPA

B. Fagale: OEPA





mot file copy

Alcan Sheet and Plate

Division of Alcan Aluminum Corporation



390 Griswold Street, N.E., Warren, Ohio 44483 Mailing Address: Box 1151, Warren, Ohio 44482. Telephone: 216/841-3331

NO ACTION TAKEN PENDING DECISION OF CATRORAWAL

August 29 , 1983

RECEIVED

Mr. Thomas Crepeau Division of Hazardous Materials Management Ohio EPA 361 E. Broad St. Columbus, Ohio 43215

SFP 1 p 1983

WASTE MANAGEMENT PRANCH
EPA, RECIDING PA,G, TISD

Dear Mr. Crepeau:

At the present time this plant is a storer and generator of hazardous waste. However, pursuant to the regulations pertaining to storing hazardous waste, we hereby request the removal of this plant's storage status. We still meet the criteria in 40CFR Part 262, applicable to generators of hazardous waste and will continue to maintain this status.

The facility requesting the status change is operating under permit no. OHD-004457222 and is located at:

> Alcan Sheet and Plate Division of Alcan Aluminum Corporation 390 Griswold N. E. Warren. Ohio

This request is based on the following:

- No hazardous waste storage will occur on-site at this point for longer than 90 days.
- 2. No hazardous waste treatment, including neutralization and preatment of waste before going to the city sewer occurs on-site at this plant.
- 3. No hazardous waste is accepted from off-site at this plant.
- No hazardous waste disposal occurs on-site at this plant.

I am enclosing a copy of our closure plan and a copy of our 1982 Facility and Generator Annual Report.

I understand that an inspector from EPA may visit the Warren Plant to verify the information contained in this letter.







Thank you for your cooperation and assistance with this matter.

Yours truly,

D. D. Foley Vice-President and Technical Officer

DDF:jmm Enclosure

cc:

Kathy Homer - EPA Region V Jim Mayka - EPA Region V C. Frazier - OPEA

D. Green

A. E. Hinsdale

P. L. Morris T. H. Rowley



CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Permit Appl. No. <u>OHD-004457222</u>

Signature of Executive Officer

Alcan Sheet and Plate Division
Alcan Aluminum Corporation
Facility Name

D. D. Foley, V. P. and Technical Officer
Title

August 29, 1983

Date

WHO SHOULD SIGN THE CERTIFICATION STATEMENT?

- A. For a corporation: By a principal executive officer of at least the level of vice president;
- B. For partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- C. For a municipality, State, Federal or other public facility: By either a principal executive officer or ranking elected official.

Note: Establishment of a hazardous waste facility without an effective permit is prohibited pursuant to Sections 3734.02 and 3734.11 of the Ohio Revised Code.

0427R

Alcan Sheet and Plate

Division of Alcan Aluminum Corporation



Box 1151, Warren, Ohio 44482. Telephone: 216/841-3331

June 28, 1983

NO ACTION TAKEN
PENDING DECISION ON VITIDIAWAL
BY 184 STAFF

7/13/83

Mr. Thomas Crepeau Division of Hazardous Materials Management Ohio EPA 361 East Broad Street Columbus, Ohio 43215

OHD 004 457 222, PAJG, TSD

Dear Mr. Crepeau:

At the present time this plant is a storer and generator of hazardous waste. However, pursuant to the regulations pertaining to storing hazardous waste, we hereby request the removal of this plant's storage status. We still meet the criteria in 40CFR Part 262, applicable to generators of hazardous waste and will continue to maintain this status.

The facility requesting the status change is operating under permit No. OHD-004457222 and is located at:

Alcan Sheet and Plate
Division of Alcan Aluminum Corporation
390 Griswold NE
Warren, Ohio 44483

This request is based on the following:

- 1. No hazardous waste storage will occur on-site at this plant for longer than ninety (90) days.
- 2. No hazardous waste treatment, including neutralization and pretreatment of waste before going to the city sewer occurs on-site at this plant.
- 3. No hazardous waste is accepted from off-site at this plant.
- 4. No hazardous waste disposal occurs on-site at this plant.







I am enclosing a copy of our closure plan and a copy of our 1982 Facility and Generator Annual Report.

I understand that an inspector from EPA may visit the Warren Plant to verify the information contained in this letter.

Thank you for your cooperation and assistance with this matter.

Sincerely,

A. E. Hinsdale Plant Engineer

AEH:bls Enclosures

cc: Kathy Homer - EPA Region V

D. Green

P. Morris

T. Rowley

Christine Frazier - OEPA

Alcan Sheet and Plate

Division of Alcan Aluminum Corporation



390 Griswold St., N.E., Warren, Ohio 44483 Mailing Address: Box 1151, Warren, Ohio 44482. Telephone: 216/841-3331

August 10, 1982

Ms. Kathy Homer U.S. EPA Region V 230 Dearborn St. Chicago, Illinois 60604

8/23/82

Dear Ms. Homer:

Enclosed is a copy of Page 3 of our Part A application. Please note that we have revised our EPA hazardous waste number and the estimated annual quantity of waste.

I am forwarding you a copy of this revision as requested by Christine Mikoy Frazier of OEPA.

The facility to be covered by this revised application is operating under Hazardous Waste Number OHD-00-4457222 and is located at: (4,750,P)

Alcan Sheet and Plate Division of Alcan Aluminum Corporation 390 Griswold St. Warren, Ohio 44483

If you have any questions, please call me at (216) 841-3249.

Yours truly,

Donzell Green Process Chemist

DG:jmm

cc:

A. E. Hinsdale

P. L. Morris

T. H. Rowley

RECEIVED

AUG 12 1982

WASTE MANAGEMENT BRANCH EPA. REGION V



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Specify) Not Applicable	2	7	(specify) Not	Applicable	
VIII. OPERATOR INFORMATION		15 16 - 19			
	A. NAME	- 	, 		B. Is the name listed in Item VIII-A also the owner?
8 ALCAN ALUMINUM 15 TB	C O R P O R A			98	¥ YES □ NO
C. STATUS OF OPERATOR (Enter the app. F = FEDERAL M = PUBLIC (other than S = STATE O = OTHER (specify) P = PRIVATE		verbox;if:"Other" (specify) Not Applica	C.	2 1 6 5 2	2 3 6 8 8 8
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□. UIC (Underground Injection of Fluids) □ □ □ □ □ □ □	E. OTH	ER (specify)	(specify)		
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C. RCRA (Hazardous Wastes)	E. OTH	ER (specify)	(specify)		
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XI, MAP					
Attach to this application a topographic mathematic position of the facility, the location of treatment, storage, or disposal facilities, an water hodies in the man area. See instruction	each of its existing and deach well where it in	proposed intake iects fluids under	and discharge stru- rground, løclude a	ctures, each of its	hazardous waste
water bodies in the map area. See instruction XII. NATURE OF BUSINESS (provide a brief descr			9 A/50		
The Warren plant of Alcan Alum		. Sheet and	Plate Divisi	on, is an a	luminum
cold rolling, painting, and fi	nishing facility	. We recei	ve coils of a	luminum as d	our raw
material and cold-roll, anneal intermediate form for shipment					
product.	oo our ous come.				o a
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XIII. CERTIFICATION (see instructions) I certify under penalty of law that I have p	ersonally evamined and	l am familiar with	the information s	uhmitted in this	andication and all
attachments and that, based on my inqui application, I believe that the information false information, Including the possibility of	ry of those persons im is true, accurate and co	mediately respor implete. I am av	sible for obtaining	the information	contained in the
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNA	TURE	1/1//	C. D.	ATE SIGNED
Dennis D. Foley Vice President & Technical	Officer	laun 1	1/2 Dust	11.	-17-80
COMMENTS FOR OFFICIAL USE ONLY		WAVE TO A		17	1 1 U =
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Form Approved OMB No. 158-880004 9

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U.S. BROMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Fragram
Consolidated Permits Fragram

Application 3405 of RCRA.)

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II. FIRST OR REVISED APPLICATIO		Janes salasia salasia de filos	application you are submitting for your facility or a
revised application. If this is your first applic	o below therk one box omy/ to ind cation and you already know your fi	activity's EPA LO Number, or	application you are submitting for your facility or a if this is a revised application, enter your facility's
EPA I,D, Number in Item I above.	The state of the second state of the second	n andre de la minima de la colonia de la La colonia de la colonia d	
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			FOR NEW FACILITIES.
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B. REVISED APPLICATION (place on		*	72 75 77 76 77 78 EXPECTED TO BEGIN
i. FACILITY HAS INTERIM STAT		e to j	2. FACILITY HAS A RCRA PERMIT
III. PROCESSES — CODES AND DES	IGN CAPACITIES		72
, , , , , , , , , , , , , , , , , , ,		best describes each process to	o be used at the facility. Ten lines are provided for
entering codes, if more lines are needed,	enter the code(s) in the space provi	ded. If a process will be used	that is not included in the list of codes below, then
describe the process (including its design			
B. PROCESS DESIGN CAPACITY — For each 1. AMOUNT — Enter the amount.	ach code entered in column A enter	the capacity of the process.	
2. UNIT OF MEASURE — For each amomentum measure used. Only the units of measure are seen as a second			measure codes below that describes the unit of
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	CUBIC YARDS OR CUBIC METERS	SURFACE (MPOUNDME)	TO2 GALLONS PER DAY OR LITERS PER DAY
	GALLONS OR LITERS	INCINERATOR	T03 TONS PER HOUR OR METRIC TONS PER HOUR;
sposal:			GALLONS PER HOUR OR
AJECTION WELL D79	GALLONS OR LITERS		LITERS PER HOUR
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c. space for additional process codes or for describing other processes (code "T04"). For each process entered here include design capacity.

Not Applicable

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS,	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
 quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
 "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed westes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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Continued from the front.		
IV. DESCRIPTION OF HAZARDOUS WAS 3 (co.	ntinued)	
E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODES FROM ITEM D(1) ON PAGE 3.	
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	Not Appliantle	
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EPA I.D. NO. (enter from page 1)		
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13 14 15		
V. FACILITY DRAWING All existing facilities must include in the space provided on	nana 5 a scale drawing of the facility (see instructions for	ir more detail). F6 B/55
VI DUOTOCDAPHS		
All existing facilities must include photographs (aer	ial or ground—level) that clearly delineate all exis	ting structures; existing storage,
	rage, treatment or disposal areas (see instructions	for more detail). PG B/56
VII, FACILITY GEOGRAPHIC LOCATION		
LATITUDE (degrees, minutes, & second	s).	degrees, minutes, & seconds)
8 0 4 8 0 4 5	<u>4</u>	
VIII. FACILITY OWNER		
X A. If the facility owner is also the facility operator as skip to Section IX below.	listed in Section VIII on Form 1, "General Information"	, place an "X" in the box to the left and
B. If the facility owner is not the facility operator as	listed in Section VIII on Form 1, complete the followin	g items:
	Lity's Legal Owner	2. PHONE NO, (area code & no.)
	LITT S LEGAL OWNER	
E Not Applicable		55 55 - 56 59 - 61 52
3. STREET OR P.O. BOX	4. CITY OR TOWN	5.ST. 6. ZIP CODE
F	G	
IX. OWNER CERTIFICATION	45. 45. 15 15.	40 41 42
I certify under penalty of law that I have personally	rexamined and am familiar with the information	submitted in this and all attached
documents, and that based on my inquiry of those	individuals immediately responsible for obtaining	the information, I believe that the
submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	ete. I am aware that there are significant penalties	for submitting false information,
A. NAME (print or type)	B. SIGNATURE	C, DATE SIGNED
Dennis D. Foley	B. SIGNATURE	
Vice President & Technical Offic	er Marin Heters	11-17-80
X, OPERATOR CERTIFICATION	The second secon	
I certify under penalty of law that I have personally	examined and am familiar with the information	submitted in this and all attached
documents, and that based on my inquiry of those submitted information is true, accurate, and comple	individuals immediately responsible for obtaining	the information, I believe that the
submitted information is true, accurate, and complete including the possibility of fine and imprisonment.	ete, i am aware mat mere are significant penalties	ic, danneng iase mornation,
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
		S. P. C.
Not Applicable		
EPA Form 3510-3 (6-80)	PAGEAOES	CONTINUE ON PAGE

FORM P RCRA



HAZARD

U.S. E. RONMENTAL PROTECTION AGENCY

IAZARD S WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

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II. PROCESSES (continued)

. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE

Not Applicable

IV	DESCRIPTION	OF HAZARDOUS WAST	`ES

1. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.
- UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE		METRIC UNIT OF MEASURE CODE
POUNDS	Р		KILOGRAMSK
TONS	. , . T	,	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

), PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
 "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

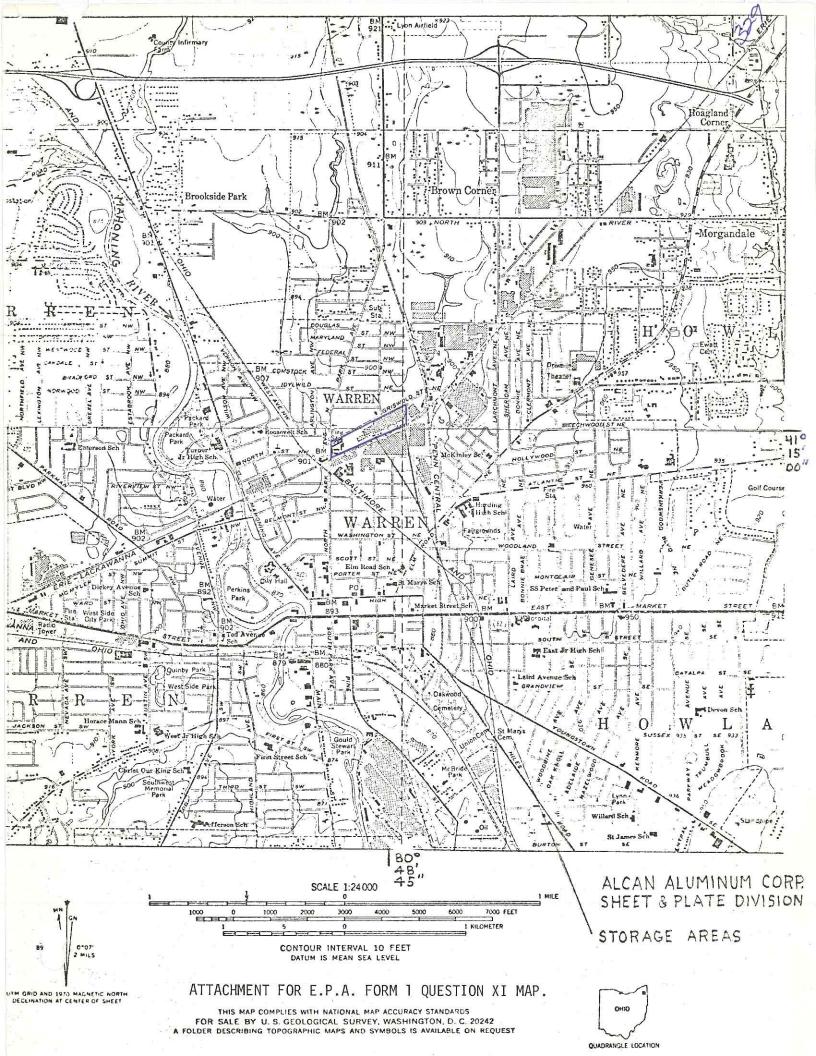
EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

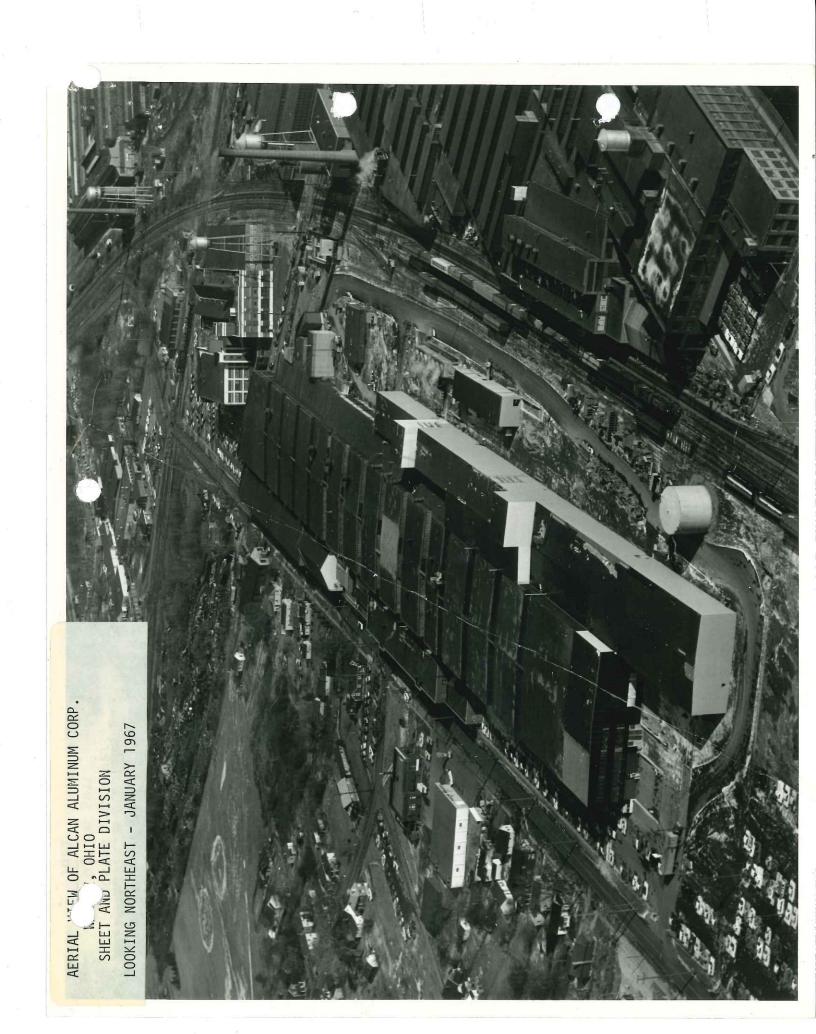
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X-3	$D \mid 0 \mid 0 \mid I \mid$	100	P	T 0 3 D 8 0											
X-4					included with above										

withave more than 26 wastes to list, Foun Approved OMB No. 158-580004 FOR OFFICIAL USC ONLY DUP DUP OF HAZARDOUS WASTES (continued) C.UNIT OF MCA-SURE (cater code) D. PROCESSES ďD. B. ESTIMATED ANNUAL QUANTITY OF WASTE NO 1. PROCESS CODES (cater) Z. PROCESS DESCRIPTION (if a code is not entered in D(1)) iter code) S 0 1 Not Applicable 0 3 P 103,000 0 5) D 0 1 m 3510-3 (6-89) CONTINUE ON HE VEHSE

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V. FACILITY DRAWING		
	vided on page 5 a scale drawing of the facility (see instr	uctions for more detail). F6 B/55
VI. PHOTOGRAPHS	La de la contraction de la con	o all avicting structures: existing storage.
All existing facilities must include photograp	ohs <i>(aerial or ground—level)</i> that clearly delineat ture storage, treatment or disposal areas <i>(see inst</i>	tructions for more detail). F6 B/56
VII. FACILITY GEOGRAPHIC LOCATION	Carlo Storago, trootinone	
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VIII. FACILITY OWNER		
A. If the facility owner is also the facility operation to Section IX below.	erator as listed in Section VIII on Form 1, "General In	formation", place an "X" in the box to the left and
B. If the facility owner is not the facility ope	erator as listed in Section VIII on Form 1, complete the	e following items:
	OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E Not Applicable		55 56 - 58 59 - 61 62 - 65
3. STREET OR P.O. BOX	4. CITY OR TOWN	5.ST. 6. ZIP CODE
F	G	
15 / 16	45 15 16	40 41 42 47 - 51
IX. OWNER CERTIFICATION		and all attached
	ersonally examined and am familiar with the info f those individuals immediately responsible for	
documents, and that based on my inquiry of submitted information is true, accurate, and	I complete. I am aware that there are significant	penalties for submitting false information,
including the possibility of fine and impriso	inment.	
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Dennis D. Foley	1/21	11-17-80
Vice President & Technical	Officer /////////	ω
X, OPERATOR CERTIFICATION		in the standard attached
	ersonally examined and am familiar with the information of those individuals immediately responsible for domplete. I am aware that there are significant onment.	
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Not Annilosti		
Not Applicable		CONTINUE ON PAGE 5
EPA Form 3510-3 (6-80)	PAGE 4 OF 5	





C O ENVIRONMENTAL PROTECTION JENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 1982

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

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OHIO E TRONMENTAL PROTECTION AGENT

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 1982

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the phio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F O H D O O 4 4 5 7 2 2 2 1 1 1 2 13 14 15

II. NAME OF INSTALLATION

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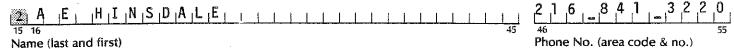
III. INSTALLATION MAILING ADDRESS



IV. LOCATION OF INSTALLATION

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15 16				 45	47 48 Courts Code
			,		County Code

V. INSTALLATION CONTACT



VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of <u>all</u> hazardous waste transporters whose services were used during the reporting year.

Ligon Federab EPA ID # KYD-008-778-847

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information in true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. E. Hinsdale

Print/Type Name Title

Signature of Authorized Representative

Date Signed

OLLIO ENVIRONMENTAL PROTECTION AGENCY

FACILITY ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 1982

GENERATOR INFORMATION

(specify generator from which all wastes on this page were received)

VIII. FACILITY'S EPA I.D. NO.

T/AC

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OHIO EN IRONMENTAL PROTECTION AGENC.

FACILITY ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 1982

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORMS
Please print/type with elite type (12 characters per inch)
I. FACILITY'S EPA I.D. NUMBER
1 2 13 14 15
II. NAME OF FACILITY
1 A 1 L 1 C A 1 N
III. FACILITY MAILING ADDRESS
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IV. LOCATION OF FACILITY
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V. FACILITY CONTACT A E H I N S D A L E
VI. COST ESTIMATES FOR FACILITY A. Cost Estimate for Facility Closure B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)
\$ 3 4 0 0 16 18 19 21 22 24 \$ 25 27 28 30 31

CERTIFICATION

I certify under penalty of law that i have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information in true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

				·- \			,	, *		
Print/Type Name	· T	itle	Signature of A	uthorize	d Represe	ntativ	e		Date S	igned

F CAN STANDARD PRACTICE

Warren Location		Technical Department	· · · · · · · · · · · · · · · · · · ·	Code			
TITLE			Index No.	19-1-4	p—	essess	
Hazardous Waste	Facility	Closure Plan	Effective Issue	6/25/82 2			
			Page	1	of	4	

I. PURPOSE

- A. To meet the requirements of the hazardous waste permit under the area of Part 265, Sub-part G by placing on file a written plan to close the hazardous waste facility.
- B. To describe in detail the steps necessary to remove all hazardous waste when operation of the facility ceases.

II. REFERENCES

Federal Register/Vol. 45, No. 98/Monday, May 19, 1980.

III. BACKGROUND

Subtitle "C" of the Solid Waste Disposal Act, as amended by the Resource Conservation Act of 1976, as amended (RCRA) directs the USEPA, with state and local agencies, to enter into programs designed to protect human health from the improper management of hazardous waste. On November 19, 1980, the regulations, (Part 265, Sub-part G) establishing requirements applicable durin the interim status period became effective.

These regulations (Part 265, Sub-part G) require the owner, operator of a hazardous waste facility to have a written closure plan. This plan must be kept at the facility. This plan must identify the steps necessary to completely close the facility at any point during its intended life and at the end of its intended life.

A. Closure Plan Availability

This plan will be placed in the Warren Plant Standard Operating Practice Book. The closure plan may be reviewed by the USEPA and/or State of Ohio EPA personnel on-site anytime during normal working hours. This review should be conducted in the Plant Engineering office.

ALCAN STANDARD PRACTICE

٠.	Warren	Technical	•			
	Location	Department		Code	ant .	
	TITLE Hazardous Waste	r Facility Closure Plan	Index No. Effective Issue Page	19-1-4 6/25/82 2	of	4

IV. PROCEDURE

A. Amendments

The <u>Technical Department</u> will amend this plan anytime changes in operating or facility design affect the closure plan.

B. Implementation of the Closure Plan

- 1. 180 days prior to closure of the plant or the hazardous waste facility, the Engineering Department will advise the USEPA Regional Adminstrator of facility closure by submitting this written plan. The Engineering Department will handle all hazardous waste facility closure correspondence between the company and EPA.
- 2. Upon filing this plan for closure with the USEPA Regional Adminstrator, the Engineering Department will prepare a written memo to the respective department managers giving date of notification to USEPA and advising them that the hazardous waste facility closure plan SPI should be followed.
- The Purchasing Department will advise, in writing, all manufacturers who sell hazardous materials to the plant that all orders placed must be delivered within the next 60 days and that no deliveries will be received after this date. This notification will be copied to all the respective department managers.
- 4. The <u>Production Department</u> will take a daily inventory of all hazardous chemicals and all hazardous waste in-house and will advise, in writing, the Purchasing Department on a daily basis.
- hazardous chemicals and all hazardous waste in-house at any given time. The in-house hazardous waste inventory shall not exceed 85 fifty-five gallons drums. This fill will be available at any given time for inspection by OEPA in the Engineering department. At no time must hazardous materials inventories exceed the following schedule:

ALCAN STANDARD PRACTICE

Warren Location	Department	Code					
TITLE Hazardous Waste	Facility Closure Plan	Index No. 19-1-4 Effective 6/25/82 Issue 2 Page 3 of 4	-				

a. 180 days

Three months of hazardous material inventory in-house

b. 120 days

Three months of hazardous material inventory in-house

c. 90 days

Two months of hazardous material inventory in-house.

d. 60 days

One month of hazardous material inventory in-house.

NOTE: (If hazardous material inventory exceeds the above schedule, Step 6, Parts a and b should be followed).

- 6. Thirty days prior to plant or hazardous waste facility closing, the <u>Purchasing Department</u> will decontaminate the hazardous waste facility by:
 - a. Returning to the manufacturers returnable goods.
 - b. By manifesting all hazardous waste, hazardous waste containers (empty containers, etc.) all hazardous waste equipment (dirty rags, etc.).
- 7. After closure is completed, the Engineering Department will submit to the regional Administrator, certification, both by the Plant Manager and by an independent registered professional engineer, that the facility has been closed in accordance with the specifications in the approved closure plan.

Prepared by Deen 18.6/11/12	Approved by Mouley
•	Approved by P. L. Morris
	Approved by A. E. Hinsdale

75750 OHD 004 457222

Alcan Aluminum Corporation



100 Erieview Plaza, Cleveland, Ohio 44114 Mailing Address: P.O. Box 6977, Cleveland, Ohio 44101. Telephone: 216/523-6800

July 6, 1982

U.S. Environmental Protection Agency Region V Waste Management Branch c/o Mr. William Miner 111 West Jackson Boulevard Chicago, Illinois 60604



Dear Mr. Miner:

Pursuant to the regulations pertaining to the financial requirements of hazardous waste management, we hereby request a 90-day extension of time in which to submit evidence of insurance or any of the other acceptable means of demonstrating financial responsibility under the regulations. I certify that we have grounds to believe we meet the criteria of the financial test.

The facility to be covered by the test is operating under Permit No. OHD-004457222 and is located at:

Alcan Sheet & Plate Division of Alcan Aluminum Corporation 390 Griswold Avenue, N.E. Warren, Ohio 44483

Our current estimate of closure cost is \$3,400. We do not have an estimate of post-closure costs, since this is not a disposal facility.

Our most recent fiscal year ended December 31, 1981, and our year-end financial statements were audited by independent certified public accountants.

If there are any questions about this request for an extension of time, please don't hesitate to call me at (216) 523-6880. Thank you for your cooperation.

Yours very truly,

Donald G. Schurman

Vice President - Finance







Re: Hazardous Waste Activity Status

U.S. EPA I.D. No. OHDOO4457222 6, PA - 3, N

Ohio Permit No. 02-78-0049

April 1, 1985

D.D. Foley Vice President & Tech. Ofr. Alcan Aluminum Corporation P.O. Box 1151 Warren, Ohio 44482

Dear D.D. Foley:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau, Manager

Thomas E. Crepeau

Data Management Section

Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V

HWFB

D.O.

MAR 17 1983

Mr. Donzell Green Process Chemist Alcan Sheet and Plate Box 1151 Warren, Ohio 44482

RE: U.S. EPA ID #: OHD 004-457-222
Alcan Sheet and Plate
Division of Alcan Aluminum Corp.
390 Griswold Street N.E.
Warren, Ohio 44428

Dear Mr. Green:

This is to inform you that the United States Environmental Protection Agency (U.S. EPA) is withdrawing the December 2, 1982, administrative discretion letter issued to your company for the above-referenced facility.

According to 40 CFR 265.176, containers holding ignitable or reative waste must be located at least 15 meters (50 feet) from the facility's property line. Your letter of October 29, 1982, requested a "waiver" from this requirement, and outlined that to comply with 40 CFR 265.176, the commpany would: (a) violate the fire protection insurance by moving wastes closure Closer to the building, and (b) create momeref a hazard potential than currently exists. In addition, the neighboring property was identified as approximately 75 feet of abondoned railroad tracks:

U.S. EPA has recently learned from the Ohio Environmental Protection Agency (OEPA) that two of these assumptions are not accurate, and that OERA will not be granting the requested waiver. We have been informed that

- (a) the 75' of railroad tracks are not abandoned and are frequently used by Conrail, and
- (b) Alcan can relocate wastes to a new area of the facility (other than closure to a building). The new area would allow Alcan to comply with 40 CFR 265.176 wikbout violating the existing insurance protection or endangering adjacent property.

Therefore, temporary administrative discretion for compliance with 40 CFR 265.176 is terminated, and Alcan is expected to immediately fully comply with these requirements. Your facility is subject to inspection, and subsequent enforcement if violations are found.

Please contact Ms. Kathleen Homer, State Implementation Officer for Onio, at (312) 886-3718, if you have further questions regarding this matter.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

cc: Charles Wilhelm, Chief
Division of Hazardous Materials Management
Ohio Environmental Protection Agency

5HW-13:pg:Kathy Homer:3-2-83

INITIALS

KHONE - 3/3/83

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MAR 17 1983

Alcan Sheet and Pate, Warren, Ohio: Terminetion of Administration discretion grant foom 40 CFR 265.176

Karl J. Klepitsch, Jr., Chief Waste Management Branch

B.G. Constantelos, Director Waste Management Division

On December 2, 1982, I recommended that we grant Alcan Sheet and Plate, Warren, Ohio, temporary administrative discretion from the requirements fo 40 CFR 265.176. This portion of the regulations requires facilities to store ignitable wastes at least 15 meters (50 feet) from the facilities property line. Temporary administrative discretion to Alcan was based on information supplied by the company and discussed with the Ohio Environmental Protection (OEPA). At the time, The OEPA recommended granting temporary discretion to the company. Discretion was therefore granted because:

- (a) neighboring property was described as 75 feet of abandoned railroad tracks;
- (b) to reducate the waste is would be necessary to move it next to a building, rtherefore, violating their fire protection insurance;
- (c) moving the waste would create more of a hazard potentied than currently existed.

However, OEPA has recently learned that:

- (a) The railroad tracks are not "abandoned", but used frequently by Conrail;
- (b) the waste can be moved to an unpaved area, rather than next to a building, if access to the area is provided.
- (c) The facility can therefore apparently comply with 40 CFR 265.176 without violating their insurance protection.

OEPA, therefore, will not be granting a "maingr" or administrative discretion. I recommend that we terminate our discretion accordingly.

5HW-13: Kathy Homer: pg:3-2-83

INITIALS DATE

KH0783 CHIL

CHIEF CHIEF

1000 CH DIRECT 2018

5HW-TUB

Mr. Donzell Green Process Chemist Alcan Sheet and Plane Box 1151 Box 1151 Warren, Ohio 44482

RE: U.S. EPA ID # OHDOO4457222
Alcan Sheet and Plate
Division of Alcan Aluminum Corporation
390 Griswold Street N.E.
Warren, Ohio 44483

Dear Hr. Green:

My office has received your letter of October 29, 1982, requesting a variance from 40 CFR 265.176 which requires that ignitable or reactive waste containers be stored 15 meters (50 feet) from the property line. While Federal regulations do not provide for granting a variance, administrative discretion can be extended in this case because:

- a) the adjacent property is approximately seventy-five feet of abandoned conrail railroad tracks.
- b) moving the hazardous waste storage facility closer to the building would be a violation of your fire protection insurance.
- c) a new location closer to the building may be more hazardous than the current location.

Discretion is granted temporarily and may be withdrawn after notice is given. The waste storage area will bin anycease bbe reviewed again when a Part B permit is requested or received. I would remind you that this decision does not relieve you of the obligation to comply with State and local regulations where applicable.

Please do not hesitate to contact Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-3718, Ff you have any further questions regarding this matter.

Sincerely.

Basil G. Constantelos, Director Waste Management Division

cc: Charles Wilhelm, OEPA Bob Fragale, HWFAB

bcc: Part A file

Paul Dimock for inspection file

Alcan Sheet and Plate

Division of Alcan Aluminum Corporation



390 Griswold Street, N.E., Warren, Ohio 44483 Mailing Address: Box 1151, Warren, Ohio 44482. Telephone: 216/841-3331

October 29, 1982

040004457 222 G, TSD, PA

Mr. Paul Dimock U.S. EPA Region V 230 Dearborn St. Chicago, Illinois 60604 RECEIVED

NOV 2: 1982

WASTE MANAGEMENT BRANCH EPA, REGION V

Dear Mr. Dimock:

Per out telephone conversation on 10/28/82, attached for your review is a copy of our request for a waiver from OAC Section 3745-56-56.

If you have any questions, please contact me at (216) 841-3249.

Yours truly,

Donzell Green

DG: jmm

cc:

C. M. Frazier: OEPA

K. Homer: U.S. EPA

A. E. Hinsdale

P. L. Morris

T. H. Rowley





Alcan Sheet and Plate
Division of Alcan Aluminum Corporation

Royal



Box 1151, Warren, Ohio 44482. Telephone: 216/841-3331

July 22, 1982

Hazardous Waste Facility Approval Board 361 East Broad Street Columbus, Ohio 43215

Attention: Mr. Bob Fagale

Dear Mr. Fagale:

Pursuant to the regulations pertaining to ignitables being stored within fifty feet of the property line, we hereby request a waiver from OAC Section 3745-56-56. We are submitting evidence that we believe will meet the criteria in the fire protection code of 1977.

The facility requesting the waiver is operating under permit No. OHD-004457222 and is located at:

Alcan Sheet and Plate Division of Alcan Aluminum Corporation 390 Griswold St. N. E. Warren, Ohio 44483

Enclosed for your review is a map delineating our hazardous waste facility. Please note the following items:

- 1. Moving our hazardous waste facility closer to our building would be in violation of our fire protection insurance.
- 2. The adjacent property is approximately seventy-five feet of abandon Conrail railroad tracks.
- 3. We are currently storing all of our regular production paint on a blacktop surface as indicated on the map. This area houses approximately 400 drums of paint.

As you will agree, the 50 foot setback in the regulations is to protect adjacent residences, businesses and other public places from acute effects of fires that maybe caused in facilities that store flammable materials.





We, therefore, believe a 50 foot setback in our case maybe more hazardous than allowing the facility to remain where it is now.

If there are any questions about this request for a waiver, please don't hesitate to call me at (216) 841-3249. Thank you for your cooperation.

Yours truly,

Process Chemist

bр

Christine Mikoy Frazier (OEPA)

A. E. Hinsdale T. H. Rowley

P. L. Morris

Enc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

DATE:

MAR 17 1983

040004457222

SUBJECT:

Alcan Sheet and Plate, Warren, Ohio: Termination of Administrative discretion grant from 40 CFR 265.176

FROM:

Karl J. Klepitsch, Jr., Chief Waste Management Branch

TO:

B.G. Constantelos, Director Waste Management Division

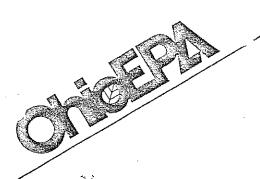
On December 2, 1982, I recommended that we grant Alcan Sheet and Plate, Warren, Ohio, temporary administrative discretion from the requirements fo 40 CFR 265.176. This portion of the regulations requires facilities to store ignitable wastes at least 15 meters (50 feet) from the facilities property line. Temporary administrative discretion to Alcan was based on information supplied by the company and discussed with the Ohio Environmental Protection (OEPA). At the time, the OEPA recommended granting temporary discretion to the company. Discretion was therefore granted because:

- (a) neighboring property was described as 75 feet of abandoned railroad tracks;
- (b) to relocate the waste it would be necessary to move it next to a building, therefore, violating their fire protection insurance;
- (c) moving the waste would create more of a hazard potential than currently existed.

However, OEPA has recently learned that:

- (a) The railroad tracks are not "abandoned", but used frequently by Conrail.
- (b) The waste can be moved to an unpaved area, rather than next to a building, if access to the area is provided.
- (c) The facility can therefore apparently comply with 40 CFR 265.176 without violating their insurance protection.

OEPA, therefore, will not be granting a "waiver" or administrative discretion. I recommend that we terminate our discretion accordingly.



Ms. Donzel Greene Alcan Aluminum Corporation 390 Griswold Street Warren, Ohio 44483

May 28, 1982

Dear Ms. Greene:

Thank you for the courtesy extended during my February 10, 1982, inspection of Alcan Aluminum Corporation. This letter is intended to follow-up that inspection.

Enclosed in this letter is a copy of the inspection report as it pertains to your facility. In general, the facility was noted to be in substantial compliance with the hazardous waste regulations. However, some concerns were noted during the inspection. They include:

- 1. no waste analysis plan as per 3745-54-13 (B);
- 2. personnel training was not documented as per 3745-54-16 (D);
- 3. Contingency Plan did not include any arrangements with local authorities, location and description of emergency equipment and a copy of the facility's evacuation plan as per 3745-54-52;
- 4. Operating Record did not include the EPA I.D. No. of the waste, EPA Handling Code, physical state of the waste, and the date of storage as per 3745-54-73;
- 5. Closure Plan did not include the maximum quantity of waste stored at any given time as per 3745-56-03; and,
- 6. ignitables were being stored within fifty (50) feet of the property line in violation of 3745-56-56.

Regarding the ignitables, if the storage area cannot be moved, please request a waiver from OAC Section 3745-56-56. The request should be directed to Tom Crepeau, OEPA-Central Office, 361 E. Broad St., Columbus, Ohio 43215.

The remaining problems should be corrected within sixty (60) days of receipt of this letter. When the problems are corrected, please notify this office in writing.

Alcan Aluminum Corporation

Page 2

May 28, 1982

We also look forward to receipt of a revised Part A application. Please send a copy of the revision to Kathy Homer of U.S. EPA - Region V, 230 S. Dearborn Street, Chicago, Illinois 60604. Call me at (216) 425-9171 if you have any questions.

Yours truly,

Christine Mikoy Frazier Christine Mikoy Frazier √

Environmental Scientist

Division of Hazardous Materials Management

CMF: km

Enclosure

cc: Paula Cotter, DHMM, C.O. Peggy Vince, HWFAB, C.O.

Kathy Homer, SIP, U.S. EPA - Region V

MOCH		
MOUL NOTICED INCOMPANDING FORM		
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	XYX	

PART 1 GENERAL INFORMATION	: aloun Olumnium Carp. Address: 390 Shisunded It Boy 1151 City: Warren	State: Ohio Zip Code: 44482 County: Juanbulk Telephone: (216) 841-3220 Facility Operator: April 7116:	Samo	City: Zip Code: Telephone:	Type of Ownership: X Private Government State HWFAB No. 02-78-0049	Date of Inspection:	4.
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INSPECTOR(S)

ne)	1276-				Treatment		the Residence						
(Telephone)	(0110) 455-9,71				. °.	sal	the Park						
	77				Storage	Disposal	futch or	J.			,		ON .
	rentext				n B.	ation E.	Dasted on	and DOO!	-	T <u>0000</u>			Yes
(Title)	muranmital Societist				Generation	Transportation	this facility (EPA HW#): Theretich on fluth on the Part A as I			R <u>D003</u>			$ \cdot $
	Churtonn				vity: A.	D.	this facility	3		C <u>D002</u>			Permit Application?
					se site activ			FOO	,	I			
· (Name)	Chin Arazie	0			Type(s) of hazardous waste site acti		Specific hazardous wastes handled at	a) Listed Wastes: F003		b) Non-Listed Wastes:	Don/	. 2	Has this facility submitted a Part A
	_:	2.	m	4	-		2.			-	•		М

Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

Yes, See Remark #

4.

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Remark
See
Yes,

Does this facility transport hazardous waste materials off-site for itself or other generators? ġ.

Yes, Complete Part 3 (Transp.)

a) Applicable U.S. EPA I.D. Number

b) Ohio P.U.C.O. GR TRSF Number

. A brief description of site activity:

The plant cold rolls anneals and "stretches" aluminim coils. They also cost (paint) + apply special suspeces to the coils enllossing)

REMARKS, PART 1. (GENERAL INFORMATION)

clean is storing ignitabled within fifty (50) feet of the sproperty line. They bear the house hequirem property the and from being now of eloan to the plant. I space did appear to be somewhat limited. Instructed them to explain their situation and request a wourk negulation,

GENERATOR REQUIREMENTS N PART

Z	
읭	
Yes	>
	. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.

Remark

Y

- from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections Does this facility generate any hazardous wastes that are excluded 261.6 and 3745-51-06 (recycle/reuse)? o.
- and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) က
- generator meets the following requirements with respect to the preparation, and retention of the hazardous waste manifest: The use 4
- The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22. a)
- generator has designated at least one permitted disposal facility and nas/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20. q
- Prepared manifests have been signed by the generator and initial trans-porter in compliance with Sections 262.23 and 3745-52-23. ()
- The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42. $\widehat{\mathbf{v}}$
- quired for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40. Signed copies of all hazardous waste manifests and any documentation re-(a)

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- The generator meets the following hazardous waste pre-transport requirements: ഗ
- Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A) a)
- Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B. Q
- The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33. ပ
- generator meets the following recordkeeping and reporting requirements: The 6
- The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B. a)
- The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable. 9
- Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.
- Sections 262.34 and 3745-52-34, the following requirements with respect to tanks for 90 days or less without a RCRA storage permit as provided under If the generator elects to store hazardous waste on-site in containers or such storage are met: ထံ
- applicable DOT pre-transport requirements for packaging, labeling and the waste is stored in closed containers which meet all Containers: marking. a)

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Remark

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Yes

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is clearly marked on each container.	
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- stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265,174 and are The area where containers 3745-56-54). $\hat{\mathbf{c}}$
- Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met. Q
- Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D. (e)
- equipped with a spill containment system with a capacity that equals or ex-Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are ceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C) 7
- Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C). (6
- Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E). \supseteq
- The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34) . თ
- 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34). The generator keeps all of the records required by Sections 265.16(d)(e) and <u>.</u>



Yes No N/A Remark#

Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265,197 and 3745-56-77) as referenced in Sections 265,34 and 3745-52-34. SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS. NOTE:

REMARKS, PART 2. GENERATOR REQUIREMENTS

Re	
N/A	>
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Yes No	
	1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).

emark

- The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52. ċ
- 3745-53-20-B and has carried the manifest with the waste shipment as required The transporter has signed the manifest as required by Section 263.20(b) and by 263.20(c) and 3745-53-20-C. സ
- facility, the transporter has signed the manifest as required in Section 263.20 Upon delivery of the hazardous waste to the next transporter or the designated (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A). 4։
- this was not possible than transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21). The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where S
- If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F. 9
- If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).
- Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control? ထံ
- Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A). (a

3-1

Yes No N/A Kemark #		13		
	b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	9. Does the transporter store hazardous wastes temporarily while they are in transit?	a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)

STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION. TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH NOTE

- Does the transporter import hazardous waste into the United States? <u>0</u>
- Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?]

263.10(c) AND 3745-3745-52. A TRANSPORTER THAT" IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND NOTE:

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

SUBPARTS INCLUDED

General Facility Standards	ш	E: Manifest/Records/Reporting	Ξ	H: Financial Requir	Redui
Preparedness and Prevention	ů.	F: Ground Water Monitoring			,
Contingency and Emergency		Closure			

rements

General Facility Standards Subpart B:

		>
of the waste mate-	to properly treat	1 3745-55-13-A-2.
analysis	be known	(a)(1) an
The operator has a detailed chemical and physical analysis of the waste mate-	rial containing all of the information which must be known to properly treat	or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.
<u>.</u>		

- rameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B). .The operator has a written waste analysis plan which describes analytical ج:
- If required due to the actual hazards associated with the waste material, the cility and has provided the following features and equipment (Sections 265.14 and 3745-55-14). operator has prevented unauthorized access to the active portions of the fa-က
- 24 hour surveillance system. (۵
- Artificial or natural barrier completely surrounding the active portion of the facility,
- Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii)) and 3745-55-14-B-2-b). Ċ
- "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C). p

Remark

N/A

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Yes

- a) Inspect emergency equipment.
- b) Inspect monitoring equipment.
- c) Inspect security, alarm and communications devices.
- d) Inspect process equipment (pipes, pumps, etc.).
- e) Inspect containment structures (dikes, curbs, etc.).
- Inspect facility for structural malfunctions (roof, floor, etc.). (
- Inspect hazardous waste handling/loading areas each day used. 6
- Record of any malfunctions due to equipment or operator errors
- i) Record of any hazardous waste discharges.
- The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. 'n
- The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records. ص
- If required due to the actual hazards associated With Ignitable, Reactive or in-(Seccompatible waste materials, the facility meets the following requirements tions 265.17 and 3745-55-17).

John Man itel

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a) Protection from sources of ignition.

b) Physical separation of incompatible waste materials.

"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. $\widehat{\,}$

Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B. 9

Subpart C: Preparedness and Prevention

Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).

If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32). ્યં

a) Internal alarm system

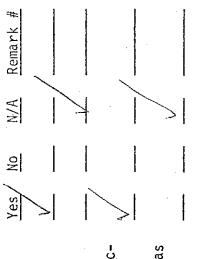
Access to telephone, radio or other device for summoning emergency assistance. 9

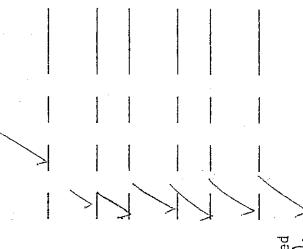
c) Portable fire control equipment.

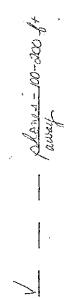
Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers ਰ

All required safety, fire and communications equipment is tested and maintained (265.33 and 3745-55-33). as necessary; testing and maintenance are documented. ო

sonnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-If required due to the actual hazards associated with the waste material, per-34). 4







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Remark

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Yes

adequate aisle space to allow unobstructed movement or emergency or spill If required due to the actual hazards associated with the waste material control equipment is maintained (265.35 and 3745-55-35). <u>ي</u>

the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). If required due to the actual hazards associated with the waste material, ė,

into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B). to enter Where state or local emergency service authorities have declined .

Subpart D: Contingency and Emergency

from The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745and contains the following components:

Actions to be taken by personnel in the event of an emergency incident. a)

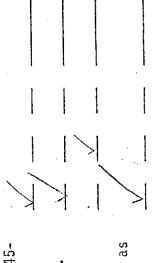
Arrangements or agreements with local or state emergency authorities 9

Names, addresses and telephone numbers of all persons qualified to act emergency coordinator. ()

emergency equipment including location, physical description and outline of capabilities. A list of all Q

handled, If required due to the actual hazards associated with the waste(s) handled an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F). (e

A copy of the Contingency Plan and any plan revisions is maintained on-site and (Sections 265. has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. 53 and 3745-55-53).



4.4

d

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Remark

N/A

Yes

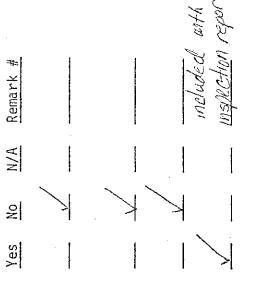
- The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54). ო
- familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265. An emergency coordinator is designated at all times (on-site or on-call) 55 and 3745-55-55). 4
- If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56. ις L

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Manifests/Records/Reporting Subpart E:

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL NOTE:

- The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:
- Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1)) and 3745-55-73-B-1. (B)
- Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). <u>a</u>
- The estimated (or actual) weight, volume or density of the waste material(s), $\widehat{\mathbf{c}}$
- A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, o



Remark

N/A

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Yes

facility.
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hazardous waste
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- FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).
- Records of any waste analyses and trial tests required to be performed. 6
- Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements Subpart B). 2
- Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-8-6. _
- Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34. j.
- The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75. તં

NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND THIS REPORT IS 3745-52-41. NOTE:

wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77). When applicable, the operator has submitted reports on releases of hazardous က်

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES. NOTE:

Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).

4-1

Remark

N/A

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Yes

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lk shipments, etc.)	-71-8).
papers are used in lieu of manifests (bulk shipments, etc.)	uirements are met (265.71(b) and 3745-55-71-B).
If shipping papers are used in	the same requirements are met (
a)	

- 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2). Any significant discrepancies in the manifest, as defined in Sections a
- Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director. ഹ
- sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ If the facility has accepted any unmanifested hazardous wastes from off-site Director within 15 days, φ.

Subpart F: Groundwater Monitoring

THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981. NOTE:

Remark

2

Yes

- The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:
- A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 5-92, -93 and -94. a)

RCRA INTERIM STATUS INSPECTION FORM

Remark

N/A

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Yes

A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C. 9

Plan that was first submitted An alternate Groundwater Monitoring System Plan that was first submitte to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D. ပ

Subpart G: Closure and Post-Closure

BOTH DISPOSAL AND NON-DISPOSAL FACILITIES: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO NOTE:

A written Glosure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)

(265.112(a)(1) A description of how and when the facility will be closed and 3745-56-03-A-1). a

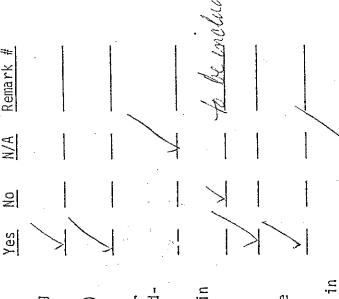
A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out. P

An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. $\widehat{\circ}$

A description of steps taken to decontaminate facility equipment. Ŧ

The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed. ص ان

The Closure Plan has been amended within 60 days in response to any changes in facility désign, processes or closure dates. ď



RCRA INTERIM STAIUS INSPECTION FORM

≍‡≒

Remark

N/A

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Yes

The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. က

. If Closure has been completed, the facility was closed in a manner which mini-	mizes any future problems in compliance with the Closure performance standard	
the facil	ompliance	6-02.
been completed,	re problems in c	in Sections 265, 111 and 3745-56-02.
If Closure has	mizes any futur	in Sections 265
4		

- The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04. a
- contaminated and any hazardous residues were properly disposed of (265.114 Upon completion of Closure all facility equipment and structures were deand 3745-56-05).
- Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06) $\widehat{\mathbf{v}}$

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES. NOTE:

- A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A. ιΩ.
- to any Plan has been amended within 60 days in response The Post-Closure Plan has been amended w changes in facility design or operation. ė,
- The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.
- The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed. α

Yes No N/A Remark

The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. 6

Subpart H: Financial Requirements

A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

0: Incinerators	P: Thermal Treatment	Q: Chemical/Physical/Biological Treatment	
L: Waste Piles	M: Land Treatment	N: Landfills	
Management of Containers	Management of Tanks	Surface Impoundments	
		• •	

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Subpart I: Management of Containers

	>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265	

Remark

N/A

의

Yes

The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54). ં

Yes No N/A Remark #

Yes Containers holding Ignitable or Reactive waste(s) are located at least-50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).

UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52) FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS

NOTE:

Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B). 4.

Remark

위	
Yes	
Yes	Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).
	Containers holding haz which may interact wit

ĸ.

Storage in Tanks Subpart J:

- The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a wastefeet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-
- equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are (c) and 3745-56-72-C) તં
- and freeboard Daily inspections are made of all systems pertinent to the proper operation of tank level the tank: discharge and cutoff, monitoring equipment, (265.194 and 3745-56-74). the tank: ო
- Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).
- Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A). ស
- A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
- Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. a

RCRA INTERIM STATUS INSPECTION FORM

#=

Remark

N/A

- so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745the tank The waste is treated immediately before or after being placed in a)
- The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction. a
- Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-8).
- Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79). φ;
- facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77). Whenever a tank is permanently taken out of service or upon closure of the <u>o</u>

Surface Impoundments Subpart K:

- The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).
- Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04). ۲,

Remark

N N

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Yes

3. The level of freeboard in the Surface Impoundment is inspected at least once	each operating day, the structural containment system is inspected at least	once per week and all such inspections are documented (Sections 265.226 and	3745-57-07).
. ,			

- Has the facility ever recorded an unplanned release of hazardous waste from Surface Impoundment(s)? (Sections 265.15 and 3745-55-15). the 4
- Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225 and 3745-57-06). 5
- prior to implementing the proposed changes and all data is on file in the A complete waste analysis plus bench scale or pilot tests were conducted facility operating record. (a
- Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. <u>q</u>
- With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Sections 265.229 and 3745-57-10). ė,
- in compliance with the safety requirements of Sections 265.17(b) and The waste is treated immediately after placement in the Surface Impound-ment so that it is no longer Ignitable or Reactive and such treatment is done in compl 3745-55-17-B. a)
- Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b)(Sections 265.230 and 3745-57-11) 7.

51

- mining the impact of the Surface Impoundment(s) on the quality of the groundwater As required by Subpart F, Sections 265.90 and 3745-55-90 (Groundwater Monitoring) the facility has implemented a groundwater monitoring program capable of deterin the uppermost aquifer underlying the facility. ω,
- In lieu of a groundwater monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Sections 265.90(c) and 3745-55-90-C. 6
- wastes, residues, liners and any contaminated soil as required by Sections 265.228 and 3745-57-09 in order to exempt the Surface Impoundment from fur-Upon closure of the Surface Impoundment, the operator intends to remove all ther regulation under Section 265. 30.

REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING (SECTIONS 265.228 AND 3745-57-09). NOTE:

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill?

5-7

EPA 9015

RCRA INTERIM STATUS INSPECTION FORM

		Yes	위	N/A	Remark#	
	b) Collection of run-off from active portions of the fill?			> `		
	c) Is collected run off treated?					
	d) Control of wind dispersal of hazardous waste?	1		\		
2.	Surveying and Recordkeeping. Does the operating record include:	•		`		
	a) A map showing the exact location and dimensions of each cell?			>	1	
	b) The contents of each cell and the location of each hazardous waste typewithin each cell?					
3	Closure and Post-Closure			,		
	a) Is the Closure Plan available for inspection by May 19, 1981?	ļ		->		
	b) Has this plan been submitted to the Regional Administrator?			1		
	c) Has Closure begun?		-	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		
	d) Is Closure cost estimate available by May 19, 1981?			72		
4.	Special requirements for ignitable or reactive waste					
	a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	1				
NOTE:	IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE SEE TREATMENT REQUIREMENTS . OF 40 CFR 265.17(b) APPLY.		IF NOT,	17E	PROVISIONS	
		Yes	위	N/A	Remark #	

5) Special Requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply. a)

RCRA INTERIM STATUS INSPECTION FORM

system?	system?
 b) Does the landfill have a chemically and physically resistant liner system? c) Does the landfill have a functional leachate collection system? d) Are free liquids stabilized prior to or immediately after placement in the landfill? 	Does the landfill have a chemically and physically resistant liner systems Does the landfill have a functional leachate collection system? Are free liquids stabilized prior to or immediately after placement in the landfill? Social requirements for Containers (effective November 19, 1981)
c) Does the landfill have a functional leachate collection system?d) Are free liquids stabilized prior to or immediately after placement in the landfill?	 c) Does the landfill have a functional leachate collection system? d) Are free liquids stabilized prior to or immediately after placement in the landfill? Special requirements for Containers (effective November 19, 1981)
 d) Are free liquids stabilized prior to or immediately after placement in the landfill? 	d) Are free liquids stabilized prior to or immediately after placement in the landfill?Special requirements for Containers (effective November 19, 1981)



Re: Application Number 81-HW-0049 Trumbull County

September 2, 1981

A. G. Hindale
Plant Engineer
Alcan Aluminum Corp.
Sheet & Plate Division
P.O. Box 1151
Warren, Ohio 44482

Dear Mr. Hinsdale:

On July 9, 1981, Robert Goulish of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan, P.E.

Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V

Robert Goulish, NEDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE ISS INSPECTION

FACILITY NO. - HW-81-0049.

OWNER - Alcan Aluminum Corp. Sheer & Plate Glass

FACILITY NAME - Alcan Aluminum Corp. Sheer & Plate Glass

FACILITY LOCATION - 390 Greswold St. NE., Warren

FACILITY CONTACT - A.E. Hinsdale, Plant Engineer PHONE NO. - (216)

ISS INSPECTION DATE - 7-9-81

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KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

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TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A. - General Facility Standards

I. General Information:

(A)	Facility Name: Alcan Aluminum Corp - Shut & Plate Co.
	Street: 390 Griswold StNE
	City: 1120120 (D) State: 040 (E) Zip Code: 44983
	Phone: 216-841-3220 (G) County: Trambull
	Operator: Alcan Aluminum Corp
	Street: 390 Griswold St NE
	City: Nancen (K) State: 04.0 (L) Zip Code 44487
(M)	Phone: 216.841-3220 (N) County: True boll
	Owner: Alcan Aluminum Corp
(P)	Street: 390 Gasanto St. NE
	City: 1201100 (R) State: Ohio (S) Zip Code: 44483
	Phone: 216-841-3220 (U) County: Trumbull
	Date of Inspection: $7-9-81$ (W) Time of Inspection (From) $\frac{9! \circ c \text{ Am}}{2! \circ c \text{ Im}}$ (To) $\frac{2! \circ c \text{ Im}}{2! \circ c \text{ Im}}$
(X)	Weather Conditions: Sunny warm + Humid
-	

(Y)	Person(s) Interviewed	Title	Telephone
	AE Hinsdale:	Flort Engineer	210741-3220
	Porgell Gun	Process Chemist	716 841-32
(Z)	Inspection Participants	Agency/Title	Telephone
	Robert Goulish.	MTAPC	216-925-9171 286-744-1918
(AA)	Preparer Information		
	Name Robert Goulish	Agency/Title OEPA/EnE	Telephone 46-4-25-9171
	<u> 11. S</u>	ITE ACTIVITY:	
. · ·	Complete sections I through VII for a facilities. Complete the forms (in p to the site activities identified bel	parenthesis) in section VIII	or disposal corresponding
<u>/</u> A	Storage and/or Treatment Containers (I) Tanks (J)	D. Incineration and/or (O and P)	Thermal Treatment
В	3. Surface Impoundments (K) 4. Waste Piles (L)	E. Chemical, Physical Treatment (Q)	, and Biological
c			
	55 gal drums for all st	ange	

III. GEMERAL FACILITY STANDARDS: (Part 265 Subpart 8)

			•		
٠		Yes	No	NI*	Remark
(A)	Has the Regional Administrator been notified regarding:				
	 Receipt of hazardous waste from a foreign source? 				N/A
	2. Facility expansion?		<u>~</u>		maintain minent capacity
(B)	General Waste Analysis:				
	 Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 	_			Tosc4 - got analysis of all
	2. Does the owner or operator have a detailed waste analysis plan on file at the facility?				the spent received - kept is file kept in fele in purchasein
- · · · · · · · · · · · · · · · · · · ·	3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				Same fele heeps mentest
c)	Security - Do security measures include: (if applicable)	:		-	Statements
	1. 24-Hour surveillance?	<u>/</u>			(man al
	2. Artificial or natural barrier around facility?	/		<u> </u>	In plant Starge - truck around
	3. Controlled entry?	/			for
	4. Danger sign(s) at entrance?				? N'est meeted
)	Do Owner or Operator Inspections Include:	•			
•	1. Records of malfunctions?	·			NA
	2. Records of operator error?	ν			NIA James
	Records of discharges?				NA
ot	Inspected man pant spells on	gast 3		to	gate funt on it is small compass

III. GENERAL FACILITY STANDARDS - Continued

u	. •		Yes	No	NI*	Remarks
	4.	Inspection schedule?		go-dec-do-	~~~	havinged to gave bu prices in
	5.	Safety, emergency equipment?	V	ign dan fire		***
	6.	Security devices?	1			Company of the start of the sta
	7.	Operating and structural		***	- Ar-tu	N/A 55 gal dum
	8.	Inspection log?	é	/	€	Cheeks darley - mordiplant
(E) -		personnel training records lude: (Effective 5/19/81)				in area frequently
	1.	Job titles?	~			
	2.	Job descriptions?	1			punt stange + handling
	3.	Description of training?	<i>i</i> /			Em brigade
	4.	Records of training?			***	
	5.	Have facility personnel received required training by 5-19-81?	/	Cardonato		Safety people also traced
	6.	Do new personnel receive required training within six months?	<u>/</u>	•••	•	housey employees informed
(F)	requ	required are the following special uirements for ignitable, reactive, or ompatible wastes addressed?	-			train then
	1.	Special handling?	/		***	
	2.	No smoking signs?				
á	3.	Separation and protection from ignition sources?	1	(3-30 -30)	· ◆◆◆	isolated

for brigade at plant - all fereman menters all maintene men hey mentless

*Not Inspected

IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

Maintenance and Operation of Facility:		
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	Yes No NI* R	emarks
If required, does the facility have the following equipment:		
Internal communications or alarm systems?		PA system - phones
2. Telephone or 2-way radios at the scene of operations?	<u> </u>	used by guards
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>	SPCC plan - almost
Indicate the volume of water and/or	r foam available for fire	*
300,000 go wat si	to age took - at	control:
300,000 gos mute stated on Testing and Maintenance of	to age took - at	control:
300,000 gos mute of dense peop to treed in Testing and Maintenance of	to age took - at	control:
Testing and Maintenance of Emergency Equipment: 1. Has the owner or operator established testing and maintenance procedures	to age took - at	control: 100 14 prenue nead north fine

(E)	Is there	adequate	aisle	space
	for unobs	structed :	mové.	it?

CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

						•
(A)	Do fo	es the Contingency Plan contain the llowing information:	Yes	No	NI*	Remarks
	1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous				
		waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to				
		incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as				
		applicable.)		-		Hove plans to enclude
	2.	police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services				in spec plane
	3.	names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<u> </u>			Normal safety Emerge SPT
	4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		Committee		business office of
	5.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation,	;y	·		bulletin bound with me
	1	evacuation routes, and alternate evacuation routes?)				Council under OSHA
*Not	Ins	pected 6				How for drills

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

		Yes No	NI*	Remarks	
(B)	Are copies of the Contingency Plan available at site and local emergency organizations?	<u>/</u>			· · ·
(C _j)	Emergency Coordinator				٠.
	Is the facility Emergency Coordinator identified?	<u>/</u>			
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>/</u>			-
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u> </u>		Pepet. Heads	
(Ľ	Emergency Procedures				
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	V		Blue up furnece mai q, & Source of ignition -all re	Agon
	VI. MANIFEST SYSTEM, R (Part 26	ECORDKEEPIN 5 Subpart E	G, AND I	REPORTING	duet
(A)	Use of Manifest System	Yes No	NI*	Remarks	-
	Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u> </u>		Purchany + Total	reffin I
	2. Are records of past shipments retained for 3 years?	<u>/</u> _		e it be	 .
(B)	Does the owner or operator meet requirements regarding manifest liscrepancies?	<u>/</u>		atom follows up	<u>s</u>
				within 5 days	

*Not Inspected

. (C)	Operat	ing Record								-
	ma' re:	es the owner or operator intain an operating cord as required in 5.73?	<u>./</u>	/						
	CO	es the operating record ntain the following formation:	-			. ,				
	**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?		<u> </u>	· · · · · ·	· · · · · · · · · · · · · · · · · · ·	<u> </u>		·	
	c.	The location and quantity of each hazardous waste within the facility?		······································			N/A			
	***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)					# th			
	e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?				·				
	f.	Reports detailing all incidents that required implementation of the Contingency Plan?					NA	-	-	-
•	9.	All closure and post closure costs as applicable? (Effective 5-19-81)		-			alla.		·	_
			•				-			_

^{**} See page 33252 of the May 19, 1980, Federal Register.

^{***} Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

		Yes	NO	NI*	Remarks
) C	Closure and Post Closure				
1	I. Is the facility closure - plan available for inspection by May 19, 1981?	· ·	<u>/</u>	. `	It mareld be a secondaran
2	2. Has this plan been submitted to the Regional Administrator		/	***************************************	
3	B. Has closure begun?		/		
4	l. Is closure estimate available by May 19, 1981?		/		
Р	Post closure care and use of property			-	Wester on prapirty - send
a	las the owner or operator supplied post closure monitoring plan? (effective by May 19, 1981)				wastes on prapirty - small
•	(Part 265, S	ubpart	s I t	nru R)	
:ili	(Part 265, Some: USE AND MANAGE) ty Name: Alcan Aluminum	I MENT O	F CON	TAINER	S Inspection:
:ili	USE AND MANAGE	I MENT O	F CON	TAINER	S
	USE AND MANAGE	I MENT O	F CON	TAINER	S Inspection:
. 1	USE AND MANAGEI ty Name: <u>Alcan Aluminum</u>	I MENT O	F CON	TAINER	S Inspection:
. 1	USE AND MANAGER ty Name: A lcan Aluminum Are containers in good condition? Are containers compatible with waste in them?	I MENT O	F CON	TAINER	S Inspection:
1 2	USE AND MANAGER ty Name: Alcan Aluminum Are containers in good condition? Are containers compatible with waste in them? Are containers stored closed?	I MENT O	F CON	TAINER	S Inspection:
1 2	USE AND MANAGER Are containers in good condition? Are containers compatible with waste in them? Are containers stored closed? Are containers managed to prevent leaks?	I MENT O	F CON	TAINER	S Inspection:
1 2 3 4	USE AND MANAGES ty Name: Alcan Aluminum Are containers in good condition? Are containers compatible with waste in them? Are containers stored closed? Are containers managed to prevent leaks? Are containers inspected weekly for leaks and defects?	I MENT O	F CON	TAINER	S Inspection:

•			Yes	No	NI*	. Remai	rks		
	7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>/</u>	- -		\$-\$ \$1 \$5			
	8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>/</u>	-	~~	مينينية خلف ويود و		ئوا ئىد جەرەھىسىۋا سىرىسى	
•			J FANKS						·. <u>.</u> .
aci	lity	Name:	*	Date	of Ins	spection	1:		
	1.	Are tanks used to store only those wastes which will not cause corrosic leakage or premature failure of the tank?	on,		- washerbandhadan		wantan ya a da a a a a a a a a a a a a a a a a		
	2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures?							
	3.	Do continuous feed systems have a waste-feed cutoff?		- incomp		-			
	4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	~~		-	و المعادلة المارية الم	·		
	5.	Are required daily and weekly inspections done?	~~~		~~~ .	Walter Species of			***
	6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)			eminime.	***			
	7.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)							

	Associations buffer zone requirem or reactive wastes?										
	Tank capacity:	Machine Tolerania was son son son s	_gallo	ons	-						
	Tank diameter:		feet			4.			٠.		
	Distance of tank from property li	ne	* * * * * * * * * * * * * * * * * * *	V 		fe	et				
	(See table 2 - 1 through 2 - 6 of Code - 1977" to determine compli	NFPA's	"Flamm	mable	and	l Combu	stibl	e Liqu	ıids		
	SURFACE	K IMPOUNE	DMENTS		· .				٠.		
Facility	Name:			Date	of	Inspec	tion:		, 		
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard?								Part day day day day		-
2.	Do earthen dikes have protective covers?		(β-μ)-(β-			. a. a		· · · · · · · · · · · · · · · · · · ·	to think with the right	1-100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100	
	Are waste analyses done when the impoundment is used to store a substantially different waste than before?										•
4.	Is the freeboard level inspected at least daily?	-tr						·			
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	•	47-47-43 -								
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	**************************************	40-40-gy								
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	-									-

WASTE PILES

aci'	lity	Name:	والمراوا حياء موادي		Date of	f Inspection:
			Yes	No	NI*	Remarks
	1.	Are waste piles covered or protected from dispersal by wind?	** 5****	do endo		and the second s
	2.	Is each in-coming movement of waste analyzed before being added to the waste pile?		هسمه ت		
	3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	~~~~~~~~~~~	ayarai	4 5-35-25 -	
	4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
	5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	*****	Sportu	о -ста-	
	6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	·	*	Chross des	
	7.	Are piles of imcompatible waste protected by barriers or distance from other waste?	-	traras		

LAND TREATMENT

[‡] acility	Name:	Date of Inspection:
1.	Is treated hazardous waste capable of biological or chemical degradation?	
2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?	
3.	Is waste analyzed according to 265.273?	යාතයයා වැක්ක රජා සං යා අත - අත සං සං යා අත සං
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	
5.	Is an unsaturated zone moni- toring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	
6.	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?	
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous wast placed in the facility?	e
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)	

N LANDFILLS

Facility Name:	-	, CC 01			
	Yes	No	NI*	Remarks	
(A) General Operating Requirements Does the facility provide the following	; :	,			
<pre>**l. Diversion of run-on away from acti portions of the fill?</pre>	ive 	చిచచా	ت جي	\$100 CO 100 TO)
2. Collection of run-off from active portions of the fill?			 	**	***
3. Is collected run off treated?			**	****	
4. Control of wind dispersal of hazardous waste?		~+ ~		****	
(**Effective 11-19-81)	-			•	
(B) Surveying and Recordkeeping Does the Operating Record Include:					
 A map showing the exact location and dimensions of each cell? 		, , , , ,	. **** **		
The contents of each cell and the location of each hazardous waste type withing each cell?		, 	· · · · · · · · · · · · · · · · · · ·		
(C) Closure and Post-Closure			•		
1. Is the Closure Plan available for inspection by 5-19-81?					
2. Has this plan been submitted to the Regional Administrator?			-		
3. Has closure begun?	* ***			***	
4. Is closure cost estimate available by 5-19-81?	e 	, quaga-			
(D) Special requirements for ignitable or reactive waste	3		. • •		
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?		·		•	

			Yes	No	NI*	Remarks	
	or	waste is rendered non-reactive non-ignitable see treatment uirements)			÷		
	If 265	not, the provisions of 40 CFR 5.17(b) apply.					
E)		cial Requirements for Incompatible ites.				. · -	
		es the owner or operator dispose of compatible wastes in separate cells?					
	If 265	not, the provisions of 40 CFR i.17(b) apply.	,			************************	
F)	Spe (ef	cial requirements for liquid waste fective 11-19-81)		•			
	1.	Are bulk or non-containerized liquids placed in the landfill?	·				
	2.	Does the landfill have a chemically and physically resistant liner system?		-			
•	3.	Does the landfill have a functional leachate collection system?					•
	4.	Are free liquids stabilized prior to or immediately after placement in the landfill?	,				
3)	Spe (ef	cial requirements for Containers fective 11-19-81)					•
	shr bef	empty containers crushed flat, edded, or similarly reduced in volume ore being buried beneath the surface the landfill?					

O and P INCINERATION and THERMAL TREATMENT

(A)	Facility Name:		· · · · · · · · · · · · · · · · · · ·			<u></u>		•		•
(B)	Date of Inspection:		· · · · · · · · · · · · · · · · · · ·			<u>.</u>				
		I. Det	erminatio	on of	Stea	dy Stat	<u>e</u>			-
_			•		1	. .	· · · · · · · · · · · · · · · · · · ·		-	
Α.	Type of unit (i.e., type							. <u>.</u>	· · · · · · · · · · · · · · · · · · ·	
						<u></u>		<u> </u>	<u>*</u>	
В.	Components and steady st	ate condi								
			***	Was	this	compone	ent at SS p	orior to	addi	ng waste?
	Compone	nt		Yes	No	NI*	Remarks	•		
					•			•		
1.*		 							 	
2.		· · · · · · · · · · · · · · · · · · ·							 	
3.								 		<u> </u>
4.									 	**************************************
5.								·	•	,
			II. Wast	te An	alysi	S .			,	
		•		-						
Α.	Minimum requirements, fo	r wastes	not previ	iousl	y bur	ned/tr	eated.	•		
	1. Required analys analysis been p for the followi	erformed	n	Yes	No	NI*	Remarks			
	a. Heating val	-	. -	•						
	b. Halogen con					<u> </u>		· · · · · · · · · · · · · · · · · · ·		
-	c. Sulfur cont									
	C. Surrur Conc	Cile				-				

been substituted for analysis of either:				•	4 5	
a. Lead?	÷			· .		
b. Mercury?	•		. 			
			to onah	To owner or	* 000×3+0×	to octabli
ist other parameters for which the waste teady state or determine the types of po	lluta	ested ints w	to enab nich may	be emitte	r operator d. (Note	in
emarks any which you feel should be test	ed.)				arks	er e
		,				
•				-		
• .				-		<u>. </u>
•			-			<u> </u>
•			•			
					·	
III. Monitorin	g and	i Insp	ections	•		
	Yes	No	NI*	Remarks		
			MI	Kendiks		
re combustion/emission control instrumentoritored at least every 15 minutes?	ts 			*************		
s steady state maintained or corrections ttempted?					······	
s stack plume observed at least hourly or normal color and opacity?			-		•	
oid any stack observations made by owner or operator show a plume dif- erent than normal?**	· .			and the second s		manakan katangan di Manakan di Kabangan di Manakan di Kabangan di Manakan di Kabangan di Manakan di Kabangan d
f yes to D above, were corrections made to return emissions to normal appearance?**				and the second seco		· · · · · · · · · · · · · · · · · · ·
re the complete unit and associated equinent inspected daily for leaks, spills, and fugitive emissions?	p-			· · · · · · · · · · · · · · · · · · ·	·.	
are emergency shutdown controls and system alarms checked daily for proper operation?		-				
			_ 			

ot Inspected pec in Remarks for what period of time this was checked.

IV. Upen Burning

Yes No

Remarks

NI*

A. Only complete this part if the fac	lity open burns	nazardous	waste.
---------------------------------------	-----------------	-----------	--------

١.	Does this facility burn only
	waste explosives? (A No answer means other
	hazardous waste is open- burned.)

2. If this facility openburns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others						
0 to 100	380 m 1,250 ft 530 m 1,730 ft						

0

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name:					•		
Dat	e of Inspection:				•		•
			Yes	No	NI*	Remarks	. .
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?					• • • • • • • • • • • • • • • • • • • •	
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)		· · · · · · · · · · · · · · · · · · ·		· .		

	•					-	-	•		
-		Yes	No	NI*	Remai	rks			-	
ti	as the owner or operator addressed he waste analysis requirements of 65.402?	-		· .				· 		
A)	re inspection procedures followed coording to 265.403?	<u> </u>				_				
Aı fo	re the special requirements fulfilled or ignitable or reactive wastes?	1								
Ar ye	re incompatible wastes treated? (If es, 265.17(b) applies.)		·	,	-					
-				 -	, ·	· · · · · · · · · · · · · · · · · · ·	······································	·	· · · · · · · · · · · · · · · · · · ·	·
	tanks, transport vehicles, vessels, hazardous only because they exhibit or are listed as hazardous wastes i	the cor	rros iv	ity cha	iractori	ctiv	undas	~ 40 (cco ca	207.94
	Complete this section if the owner or hazardous waste that is subsequently disposal.	IX r operat shipped	or of i off-	a TSD site fo	facilit r treat	y al: ment	so ger , stor	nerate rage,	es or	
	Hazardous waste that is subsequently	r operat shipped	1 off-	site fo	facilit r treat	y al: ment	so ger , stor	nerate rage,	es or	
	disposal.	r operat shipped	1 off-	site fo	facilit or treat Remar	ment	so ger , stor	nerate rage,	es or	
D	disposal.	r operat shipped	UIREM	site fo	r treat	ment	so ger , stor	nerato	es or	
D o r	disposal. 1. MANI coes the operator have copies of the manifest available for eview? o the manifest forms reviewed ontain the following information: If possible, make copies of, or ecord information from, mani-	r operat shipped FEST REC Yes	UIREM	site fo	r treat	ment	so ger	nerate	es	
Door Doc(rf	disposal. loes the operator have copies of the manifest available for eview? o the manifest forms reviewed ontain the following information: If possible, make copies of, or	r operat shipped FEST REC Yes	UIREM	site fo	Remar	ment ks	50 ger , star	rage,	or	
Door Doc(rf	disposal. loes the operator have copies of the manifest available for eview? o the manifest forms reviewed ontain the following information: If possible, make copies of, or ecord information from, maniest(s) that do not contain he critical elements)	r operat shipped FEST REC Yes	UIREM	site fo	Remar	ks	, stor	rage,	or	
) Dor Dc(rft 1 2	disposal. loes the operator have copies of the manifest available for eview? o the manifest forms reviewed ontain the following information: If possible, make copies of, or ecord information from, maniest(s) that do not contain he critical elements) Manifest document number?	r operat shipped FEST REC Yes	UIREM	site fo	Remar	ks	, star	rage,	or	

	· .		Yes	No	NI*	Remarks
	3.	Name and EPA ID Number of Transporter(s)?	<u>i/</u>			
•	4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>/</u>			
	5.	The description of the waste(s) (DOT shipping name, DOT hazard class DOT identification number)?	s, _			
	6.	The total quantity of waste(s) and the type and number of containers loaded?	<u>/</u>			
	7.	Required certification?	V		. 	
	8.	Required signatures?	1/		-	
(C)		s the owner or operator submit eption reports when needed?	_		· · · · ·	
		2. PRE-TRANS	PORT RI	EQUIR	EMENTS	
(A)	wit	waste packaged in accordance h DOT Regulations? quired prior to movement of				
	haz	ardous waste off-site)	<u>i</u>		CEANAGE	Labelist
(B)	in	waste packages marked and labeled accordance with DOT regulations	-			
-	(Re	cerning hazardous waste materials? equired to movement of hazardous ete off-site)	<u>/</u>	-		
(C)		required, are placards available transporters of hazardous waste?	· <u>v</u>			Dear with people in
					-	business of laking waites

3. On Site Accumulation

		Yes	No	NI*	Remarks
1.	Are containers marked with start of accumulation date?			-	
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	· · · · · · · · · · · · · · · · · · ·			
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, container holding ignitable or reactive waste located at least 15 meters (50 Feet from facility's property line?	s			
4.	If wastes are stored in tanks, are the tanks managed according to the following requirements?		· · · · ·		
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?				***
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?		****	Waryimana,	
	c. Do continuous feed systems have a waste-feed cutoff?	·			•
	d. Are required daily and weekly inspections done?		· 		
	e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?		******		
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	ميوند ار س يابين	<u> </u>	Children	

VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

•				Yes	No	NI*	Remarks	
(A)	Exc res	epti ults	ifests, Annual Reports, on Reports, and all test and analyses retained for t three years?	/	. «••••••			
(B)	Ann	ual 1	generator submitted Reports and Exception as required?		<u> </u>	· · · · · · · · · · · · · · · · · · ·		42
			VII. INTERNA (Part 262	TIONA Sub	L SHIP part E	MENTS)	. W/A	
			installation imported rted Hazardous Waste?				canada a sa	**************************************
			(If answered Yes, complete the fo	wollc	ing as	appl	icable.)	
	1.		orting Hazardous waste, a generator:					
	:	.a.	Notified the Administrator in writing?		· · · · · · · · · · · · · · · · · · ·		 	
		b.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	· .				
•		c.	Met the Manifest requirements?			مستسي		······································
	2.		orting Hazardous Waste, the generator:					
			Met the manifest requirements?		·	منسب		

TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

	- res No	. NIX	Remarks
Are copies of the completed	-		
manifests or shipping paper(s) available for review and			
retained for three years?			•

II. INTERNATIOINAL SHIPMENTS

- A. Does the transporter record on the manifest the date the waste left the U.S.?
- B. Are signed completed manifest(s)
 on file?

V. MISCELLANEOUS

- A Does transporter transport hazardous waste into the U.S. from abroad?
- B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The company points aluminum coil, expens point and solvent are the only hayarans waste generated. This assign the confully stored and disposes of. This is a glaying plant which is part of a larger argumentaries. Everything at the plant is done professionally including their handling and preparedness for hayardows watte. No modeling and preparedness for hayardows watte.

Review as Central Gues showed minor deficiencies

Determination: NFA

PA/VSI Or RFA FILE REVIEW CHECKLIST

Facil	ity Naı	ne: Ale	can Rolled Products
EPA	ID: O	HD 004	457 222 Address: 390 Griswold St. Warren, OH
Nam	e of Re	eviewer	: Maureen McHugh Date of Review: 8/28/08
1	Yes	No	Is this a one folder site?
2	Yes	No	Are there Superfund files for this site?
3	Yes	No	Did you Read the Executive Summary?
			There are: SWMUs and AOCs at this site.
4	Yes	No	Did you review the regulatory history?
5	Yes	No	Does the facility have interim status or a permit?
			This facility is a: SQG, LQG, or Less than 90 day.
6	Yes	No	Was the Facility closed per RCRA?
			If Yes, was the closure: CC, or CIP.
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.
8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.
As a	result o	of your r	eview of the PA/VSI or RFA file, please classify this site as:
and	any oth	er SWM	corrective action recommended or warranted: These are sites that closed the regulated units IUs or AOCs at the site did not warrant any further corrective action (no historic releases or observed during the Visual Site Inspection).
SWI	vestiga MU or A	tion that AOC and	ion Required: Soil or sediment sampling or groundwater sampling or monitoring or any type was recommended in the report in response to a documented or observed release at any d where such investigation, whether being addressed during the inspection or after, does not documentation in the facility record files.
	Mo	re Infort	nation Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes
D: C 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release,
please identify the SWMU or AOC and a one or two line description of release.
Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each
release, please identify the SWMU or AOC and a one or two line description of release.
· · · · · · · · · · · · · · · · · · ·
DA WOLD
PA/VSI Recommendations
This site was reviewed by Todd Gmitro and his findings were:
January 28, 1993-PRC PA/VSI. 7 SWMUs and 1 AOC were identified. The AOC is a solvent UST which was scheduled
to be removed at the time of the PA/VSI. No actual or potential releases from the SWMUs.
April 1985-Ohio EPA approval of container storage closure and withdrawal of Part A.
Conclusion: Determine if the UST was removed as scheduled in 1993. No further action at the other SWMUs is
recommended.
Looked this site up in the DUSTD Detahose and discovered that 2 USTs were removed in 1002 and 1004. Since this were
Looked this site up in the BUSTR Database and discovered that 2 USTs were removed in 1993 and 1994. Since this was
the only concern at the site, no further action is warranted.

Chicago, IL 60601 312-856-8700 PRC Environmental Management, Inc. 233 North Michigan Avenue Fax 312-938-0118 Suite 1621



PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

ALCAN ROLLED PRODUCTS COMPANY (FORMERLY ALCAN SHEET AND PLATE) WARREN, OHIO

FINAL REPORT

スリ 2 NITIAL

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Contract No. PRC No. Prepared by Date Prepared Site No. EPA Region Work Assignment No. OHD 004 457 222 January 28, 1993 68-W9-0006 309-R05032OH22 R05032 PRC Environmental Management, Inc. (Jack D. Brunner)

Contractor Project Manager Telephone No. EPA Work Assignment Manager Telephone No. Shin Ahn (312) 856-8700

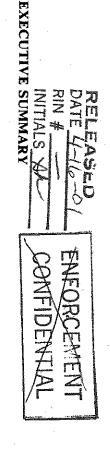
Kevin Pierard (312) 886-4448

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FACILITY LAYOUT	FACILITY LOCATION	<u>Page</u>	LIST OF FIGURES		SWMU AND AOC SUMMARY	SOLID WASTES	SOLID WASTE MANAGEMENT UNITS	Page
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solid waste management units (SWMU) and one other area of concern (AOC) at the Alcan Rolled hazardous wastes or hazardous constituents from the SWMUs and AOC identified Products Company, formerly Alcan Sheet and Plate (Alcan), facility in Warren, Trumbull County visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from This summary highlights the results of the PA/VSI and the potential for releases of PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and

primarily for the aluminum can industry. The facility currently employs about 80 people in a mixed-use industrial and residential area The Alcan facility currently conducts secondary aluminum coil coating operations.

about 1914 and was operated by the U.S. Navy. Further details regarding past facility operations operations at the facility. According to facility representatives, the facility was originally built in were not available. included cold rolling and annealing of aluminum. These operations were discontinued in about Alcan began operations at the facility as Alcan Sheet and Plate. Past facility operations also subsidiary of Alcan Aluminum Limited of Montreal, Quebec, Canada. In approximately 1965, Prior to 1965, the Bridgeport Brass Company and National Distillers conducted similar The Alcan facility is a division of Alcan Aluminum Corporation, a wholly-owned

and D007); waste carbon tetrachloride (F001); wastewater treatment sludge (F019); and solvent, and waste solvent-soaked rags (F003, F005, D001, and D035); chromic acid sludge (D002 nonhazardous wastewaters, wax coatings, aluminum sheet cleaning residue, and used oil. wastes are ultimately shipped off site for treatment or disposal. Currently, the following wastes are routinely generated at the facility: waste paint, waste

status change in April 1985 EPA acknowledged Alcan's change in status to a generator only. OEPA acknowledged Alcan's facility. No sampling activities were specified in the facility closure plan. In September 1984 Alcan submitted a closure plan to OEPA and requested the removal of its status as a storage listed container storage (S01) at one area, the Container Storage Area (SWMU 3). In June 1983, In November 1980, the facility submitted a Part A Permit Application. This application

The PA/VSI identified the following seven SWMUs and one AOC at the facility:

Solid Waste Management Units

765432

Storage Building 21 Hazardous Waste Storage Pad

Container Storage Area

Sludge Roll-Off Box

Wastewater Treatment System

Used Oil Storage Tank Satellite Accumulation Areas

Area of Concern

Ξ. Solvent Underground Storage Tank (UST)

PRC regarding this release. release was reported to the city. No further action was taken, and no citations were issued kerosene-based oil used during cold rolling operations, to the city sewer on May 17, 1984. found no other documentation of releases to environmental media at the Alcan facility According to facility representatives, Alcan released 300 gallons of roll coolant, a Cold rolling operations at the facility were discontinued in about 1986

potential for release to all environmental media is low indoors, or are equipped with adequate secondary containment to control future releases, the Because facility SWMUs are either inactive, manage nonhazardous wastes, are located

the property edge. facility, except along the northeast portion of the facility where the facility's Main Building abuts by a 6-foot, chain-link fence with three strands of barbed wire. The nearest residence is located within 0.5 mile of the facility. Receptors of potential releases include Alcan facility personnel and residents of Warren, The nearest schools are located between 0.5 and 1 mile from the facility This fence surrounds the Facility access is limited

Creek Lake is used as the primary source of drinking water for the city of Warren. facility at its nearest point and originates at Mosquito Creek Lake. and flows southwest to Mosquito Creek. located about 4 miles northeast of Alcan. body nearest to the facility. The Mahoning River is located about 0.75 mile west of Alcan and is the surface water The Mahoning River is used for industrial and recreational purposes Mosquito Creek is located about 2.5 miles from the Surface water from Mosquito This lake is

0.75 and 1 mile from the facility. some private wells are located in the area. Ground water is not used as the primary source of drinking water for the area. This well is located upgradient of the facility. The nearest drinking water well is located between However,



l mile of the facility. Sensitive environments are not located on site. However, wetland areas are located within

any of the facility's SWMUs. the extent of any contamination that exists at this AOC. PRC recommends no further action at primarily methyl ethyl ketone (MEK), and has a capacity of 5,000 gallons. At the time of the scheduled under the supervision of the local fire marshall. This UST stored product solvent, VSI, the removal was scheduled for late 1992. PRC recommends that removal of the facility's Solvent UST (AOC 1) continue as Soil sampling may also be required to determine

1.0 INTRODUCTION

treatment and storage facilities in Region 5 to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032

releases to the environment from solid waste management units (SWMU) and areas of concern PA/VSI process, enough information is obtained to characterize a facility's actual or potential PA/VSI is the first step in the process of prioritizing facilities for corrective action. high priority for corrective action using applicable RCRA and CERCLA authorities. CERCLA programs are working together to identify and address RCRA facilities that have a As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and Through the

been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have

The SWMU definition includes the following:

- and underground injection wells RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators,
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has management units usually exempted from standards applicable to hazardous waste
- ಠ Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used wash large parts has continually dripped onto soils.

future constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic This includes any area a strong possibility exists that such a release might occur in the An AOC is defined as any area where a release to the environment of hazardous waste

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the \mathbf{VSI}

offices and at the EPA Region 5 office in Chicago The PA generally includes review of all relevant documents and files located at state

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- each medium Provide information on release pathways and the potential for releases to
- Confirm information obtained during the PA regarding operations SWMUs, AOCs, and releases

and obtaining additional information necessary to complete the PA/VSI report identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; The VSI includes interviewing appropriate facility staff; inspecting the entire facility to

identified seven SWMUs and one AOC at the facility. from EPA Region 5 RCRA files. The VSI was conducted on October 27, 1992. It included gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and 222) in Warren, Trumbull County, Ohio. The PA was completed on October 13, 1992. PRC interviews with facility representatives and a walk-through inspection of the facility. PRC Company, formerly Alcan Sheet and Plate (Alcan), facility (EPA Identification No. OHD 004 457 This report documents the results of a PA/VSI conducted at the Alcan Rolled Products

Field notes from the VSI are included in Attachment B. The VSI is summarized and 14 inspection photographs are included in Attachment A

2.0 FACILITY DESCRIPTION

environmental setting; and receptors. processes and waste management practices; a history of documented releases; regulatory history; This section describes the facility's location; past and present operations; waste generating

P.1 FACILITY LOCATION

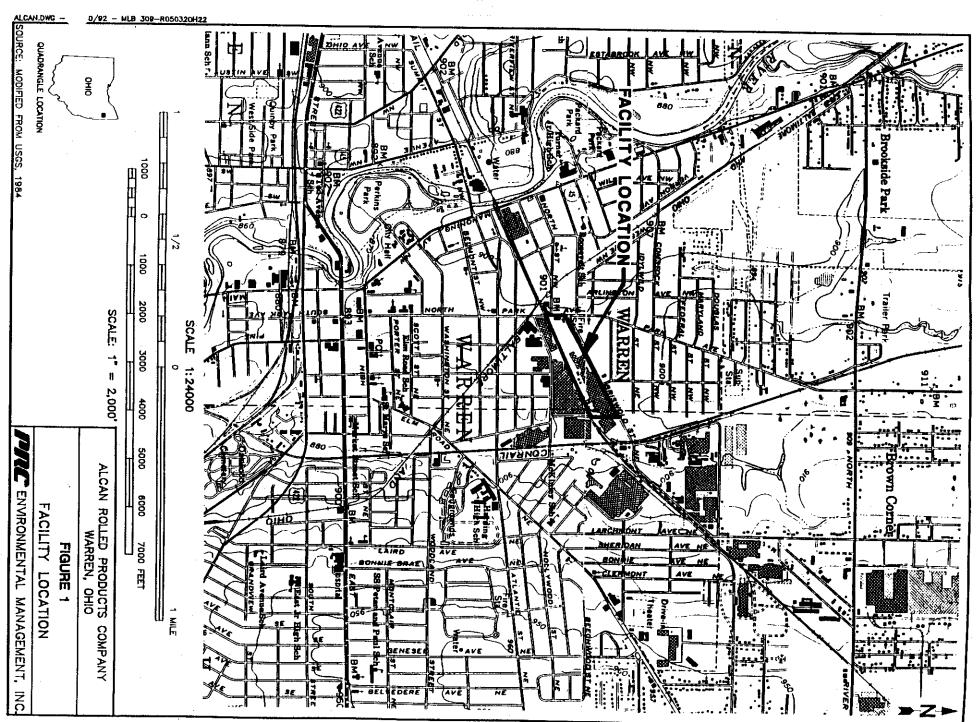
shown in Figure 1 26.5 acres in a mixed-use industrial and residential area. The location of the Alcan facility is Ohio (latitude 80°48'45" N; longitude 41°15'00" W) (Alcan, 1980b). The facility occupies about The Alcan facility is located at 390 Griswold Street NE in Warren, Trumbull County,

Company (PRC, 1992c). area across North Park Avenue. No solid wastes are managed by the Erieview Cartage Trucking by property leased from Alcan to the Erieview Cartage Trucking Company, and a commercial General Electric and Packard Electric facilities across the Conrail railroad tracks; and on the west Street NE; on the east by the Packard Electric facility across Paige Avenue; on the south by the Alcan is bordered on the north by a commercial and residential area across Griswold

edge along Griswold Street NE and Paige Avenue. along the northeast portion of the facility where the facility's Main Building abuts the property Facility access is also monitored by security guards. This fence surrounds the facility, except Facility access is limited by a 6-foot, chain-link fence with three strands of barbed wire.

2.2 FACILITY OPERATIONS

aluminum with a chrome-based solution using rollers. industry and include cleaning coils of aluminum with a sulfuric acid solution and coating the Technology (AVT) operations used to clean or pretreat aluminum coils prior to shipping them off customer specifications; and (6) recoiling. The facility recently installed pilot Aluminum Vehicle nonhazardous, petroleum-based lubricant; (5) slitting to remove edges or to finish the coil to coating with a solvent-based paint that is baked onto the aluminum; (4) lubricating with a and leveling; (2) washing or pretreating with a chrome phosphate solution in dip tanks; (3) primarily for the aluminum can industry. Alcan receives coils of aluminum from off site. following activities are associated with secondary aluminum coil coating operations: (1) uncoiling The Alcan facility currently conducts secondary aluminum coil coating operations AVT operations are used primarily to treat aluminum for the automotive The facility currently employs about 80



detail in Section 2.3. people. The facility typically operates three 8-hour shifts per day, five days per week. Solid wastes generated by facility operations and the SWMUs where they are managed are discussed in

and in Storage Building 21 (SWMU 1), located south of the Main Building. (SWMU 6) and a Sludge Roll-Off Box (SWMU 4), which are located inside the Main Building. treats coating line wastewaters in its Wastewater Treatment System (SWMU 5), also located within Facility operations take place within the 500,000-square-foot Main Building. Containerized wastes are currently managed in Satellite Accumulation Areas

operated by the U.S. Navy. Further details regarding past facility operations were not available 1965, the Bridgeport Brass Company and National Distillers conducted similar operations at the rolling and annealing of aluminum; these operations were discontinued in about 1986. the facility as Alcan Sheet and Plate in about 1965. Past facility operations also included cold subsidiary of Alcan Aluminum Limited of Montreal, Quebec, Canada. The Alcan facility is a division of Alcan Aluminum Corporation, a wholly-owned According to facility representatives, the facility was originally built about 1914 and Alcan began operations at

2.3 WASTE GENERATION AND MANAGEMENT

streams. Wastes generated by the facility are discussed below and summarized in Table 2. Waste characterizations and generation rates were provided by facility representatives during the VSI. As part of its operations, Alcan generates several hazardous and nonhazardous waste

shipped off site to OHM Resource Recovery (OHM) of Morrow, Georgia, for fuels blending Alcan generates approximately four drums of this waste every 90 days. Storage Pad (SWMU 2) and the Container Storage Area (SWMU 3). The waste is ultimately Storage Building 21 (SWMU 1). In the past, this waste was managed at the Hazardous Waste specification and outdated material. Currently, this waste is stored for less than 90 days in Waste paint (F003, F005, D001, and D035) is generated by coating operations as off-

was managed at the Hazardous Waste Storage Pad (SWMU 2) and the Container Storage Area transferred to Storage Building 21 (SWMU 1) for less than 90-day storage. gallon drums at the Satellite Accumulation Areas (SWMU 6). When the drums are full, they are isobutyl ketone (MIBK) during these operations. the coating lines are cleaned and flushed. Alcan uses methyl ethyl ketone (MEK) and methyl Waste solvent (F003, F005, D001, and D035), or "scrap KK solvent," is generated when Currently, waste solvent is accumulated in 55-In the past, this waste

approximately 40 to 50 drums of this waste every 90 days. (SWMU 3). This waste is ultimately shipped off site to OHM for fuels blending. Alcan generates

one drum of this waste every 90 days. waste is ultimately shipped off site to OHM for fuels blending. Alcan generates approximately the Hazardous Waste Storage Pad (SWMU 2) and the Container Storage Area (SWMU 3). for less than 90 days at Storage Building 21 (SWMU 1). In the past, this waste was managed at associated with the coating lines and paint mix rooms are cleaned. Currently, this waste is stored Waste solvent-soaked rags (F003, F005, D001, and D035) are generated when equipment

approximately two drums of this waste every 90 days waste is ultimately shipped off site to OHM for deactivation and disposal. Alcan generates Waste chromic acid sludge (D002 and D007) is generated when the coating line tanks are This waste is stored for less than 90 days at Storage Building 21 (SWMU 1).

does not exhibit hazardous characteristics. 20 cubic yards of this waste every 1.5 weeks. According to facility representatives, this waste Envirite Corporation of Canton, Ohio, for treatment and disposal. Roll-Off Box (SWMU 4) for less than 90-day storage. This waste is ultimately shipped off site to Wastewater Treatment System (SWMU 5). When full, this waste is transferred to the Sludge Wastewater treatment sludge (F019) is collected in an approximately 1-cubic-yard box at Alcan generates approximately

approximately one drum of this waste per year. When the drum is full, it is transferred to Storage Building 21 (SWMU 1) for less than 90-day waste is accumulated in a 55-gallon drum at the Satellite Accumulation Areas (SWMU 6). Waste carbon tetrachloride (F001) is generated by quality control (QC) testing activities This waste is ultimately shipped off site to OHM for fuels blending. Alcan generates

Building 21 (SWMU 1) before off-site shipment to OHM for treatment or fuels blending Treatment System (SWMU 5) was cleaned. solution (D002 and D007) was generated when the microfiltration unit on the Wastewater trichloroethane (TCA) (F001) was generated during parts cleaning and a waste bleach and water During 1991 and 1992, the facility also generated two nonroutine hazardous wastes. These wastes were stored on site in Storage

coating line pretreatment, are treated by the Wastewater Treatment System (SWMU 5). Sludge publicly owned treatment works (POTW) from this system is managed as discussed above. Nonhazardous wastewaters, including rinse waters and chrome phosphate solution from Effluent wastewater is discharged to the

respectively. About two to four and four to six drums of these wastes are generated every 90 days are drummed and stored at Storage Building 21 (SWMU 1) before off-site shipment to OHM. during tank cleanout and maintenance activities associated with the coating line. Nonhazardous waste wax coatings and aluminum sheet cleaning residue are generated

shipped off-site to Research Oil of Cleveland, Ohio, for fuels blending Storage Area (SWMU 3), or the Used Oil Storage Tank (SWMU 7). The waste is ultimately operations and was managed at the Hazardous Waste Storage Pad (SWMU 2), the Container (SWMU 1). maintenance activities. Nonhazardous used oils consist primarily of hydraulic oils that are generated during Until 1986, this waste also included cooling oils generated by the former cold mill Currently, this waste is stored for less than 90 days at Storage Building

facility representatives did not anticipate further generation of this waste drummed and stored at Storage Building 21 (SWMU 1) prior to off-site shipment to OHM. Alcan oven ash was generated when ventilation ducts at the facility were cleaned. In the past, the facility generated one nonroutine nonhazardous waste. This waste was Nonhazardous

and AOCs, is shown in Figure 2. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs The facility's waste streams are summarized in Table 2

2.4 HISTORY OF DOCUMENTED RELEASES

air, and on-site soils at the facility This section discusses the history of documented releases to ground water, surface water,

PRC regarding this release. This release was reported to the city. No further action was taken, and no citations were issued kerosene-based oil used during former cold rolling operations, to the city sewer on May 17, 1984. found no other documentation of releases to environmental media at the Alcan facility. According to facility representatives, Alcan released 300 gallons of roll coolant, a Cold rolling operations at the facility were discontinued in about 1986

.5 REGULATORY HISTORY

as a generator and treatment, storage, or disposal (TSD) facility (Alcan, 1980a). In November 1980, the facility submitted a Part A Permit Application. In August 1980, the Alcan facility submitted a Notification of Hazardous Waste Activity This application listed container

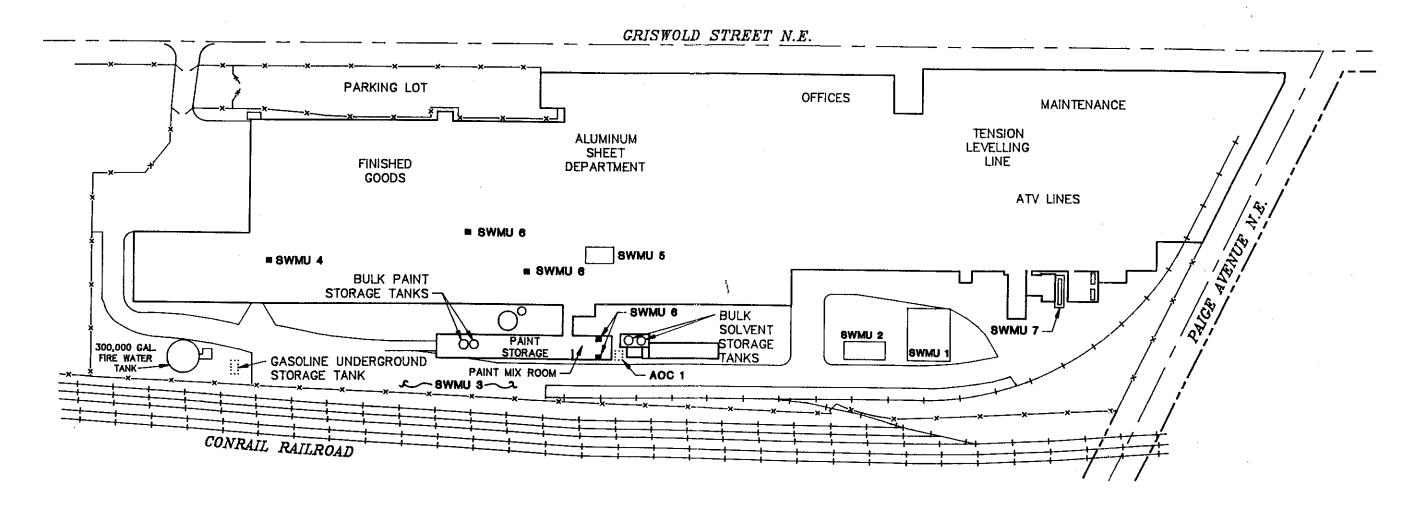
TABLE 1
SOLID WASTE MANAGEMENT UNITS

7	6	<u>ر</u>	4	Ų	,		SWMU Number
Used Oil Storage Tank	Satellite Accumulation Areas	Wastewater Treatment System	Sludge Roll-Off Box	Container Storage Area	Hazardous Waste Storage Pad	Storage Building 21	SWMU Name
No	N ₀	N _o	N _o	Yes	N ₀	No	RCRA Hazardous Waste Management Unit ^a
Inactive	Active; accumulation of hazardous waste	Active	Active; less than 90-day storage of hazardous waste	Inactive; EPA and OEPA RCRA-closure approval in 1984 and 1985, respectively	Inactive; less than 90-day storage of hazardous waste	Active; less than 90-day storage of hazardous waste	Status

Note:

A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.





LEGEND

SOLID WASTE MANAGEMENT UNITS

SWMU 1 STORAGE BUILDING 21

SWMU 2 HAZARDOUS WASTE STORAGE PAD

SWMU 3 CONTAINER STORAGE AREA

SWMU 4 SLUDGE ROLL-OFF BOX

SWMU 5 WASTEWATER TREATMENT SYSTEM

SWMU 6 SATELLITE ACCUMULATION AREAS

SWMU 7 USED OIL STORAGE TANK

AREA OF CONCERN

AOC 1 SOLVENT UNDERGROUND STORAGE TANK

40' 0 40' 80' SCALE: 1" = 80'

ALCAN ROLLED PRODUCTS COMPANY
WARREN, OHIO

FIGURE 2
FACILITY LAYOUT

PRE ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM ALCAN ROLLED PRODUCTS COMPANY SKETCH, RECEIVED BY PRC OCTOBER 27, 1992

TABLE 2
SOLID WASTES

Waste/EPA Waste Code ^a	Source	Solid Waste Management Unit
Waste paint/F003, F005, D001, and D035	Off-specification and outdated material	1, 2, and 3
Waste solvent/F003, F005, D001, and D035	Equipment cleaning and line flushing	1, 2, 3, and 6
Waste solvent-soaked rags/F003, F005, D001, and D035	Equipment cleaning	1, 2, and 3
Chromic acid sludge/D002 and D007	Tank cleaning	
Wastewater treatment sludge/F019	Wastewater treatment	4 and 5
Waste carbon tetrachloride/F001	Quality control testing	l and 6
Waste trichloroethane/F001	Outdated material	-
Bleach and water solution/D002 and D007	Cleaning of microfiltration system	
Wastewaters/NA	Aluminum coating	S
Waste wax coatings/NA	Aluminum coating	
Aluminum sheet cleaning residue/NA	Aluminum coating	-
Used oils/NA	Maintenance	1, 2, 3, and 7
Oven ash/NA	Cleaning of ventilation ducts	

Note:

Not applicable (NA) designates nonhazardous waste.

storage (S01) of F017 waste (Alcan, 1980b); the S01 unit referred to the Container Storage Area replaced the F017 waste code with F003, F005, and D001 waste codes (Alcan, 1982b) (SWMU 3). In August 1982, Alcan revised its Part A permit application; this revised application

new Hazardous Waste Storage Pad (SWMU 2), which met the 50-foot setback requirements ultimately denied Alcan's request (Alcan, 1983a). In September 1983, Alcan notified OEPA of its setback requirements for ignitable wastes (D001) stored at its Container Storage Area (SWMU 3) (Alcan, 1983d). (Alcan, 1982a). In July 1982, Alcan requested that OEPA grant the facility a waiver to the 50-foo This request was resubmitted in September 1982 (Alcan, 1982c). OEPA

September 1984, EPA acknowledged Alcan's change in status to a generator only (EPA, 1984). OEPA acknowledged Alcan's status change in April 1985 (OEPA, 1985). storage area," referring to the Hazardous Waste Storage Pad (SWMU 2) (OEPA, 1983). that the facility's permit be withdrawn and noted that Alcan had begun using a "new temporary ability to comply with the generator regulations. Pursuant to this request, OEPA conducted an inspection of the Alcan facility to confirm Alcan's August 1983 (Alcan, 1983c). No sampling activities were specified in the facility closure plan. status as a storage facility (Alcan, 1983b). This request and closure plan were resubmitted in In June 1983, Alcan submitted a closure plan to OEPA and requested the removal of its Inspection findings prompted a recommendation

container labelling. Alcan achieved compliance for RCRA violations noted during the most recent compliance inspection (OEPA, 1991b). manifesting of hazardous wastes, storing open satellite accumulation containers, and improper recordkeeping, not complying with the 50-foot setback rule for storing ignitable wastes, improper 1984; and 1991a). Violations noted during these inspections included improper In the past, the Alcan facility has been inspected for RCRA compliance (OEPA 1981;

discharges. Industrial wastewaters are discharged to the Warren Municipal Water Control representatives, the facility participates in an OEPA-approved industrial discharge program with Department's POTW via a combined sanitary and storm sewer. The Alcan facility has no National Pollutant Discharge Elimination (NPDES)-permitted PRC found no documentation of noncompliance with discharge requirements According to facility

of noncompliance with air permit requirements drying ovens that expire on July 15, 1995 (OEPA, 1992a; 1992b). PRC found no documentation Alcan also operates under several air permits, including permits for the coating lines and

it is not equipped with secondary containment. (AOC 1) was installed in 1977, and facility representatives stated that it is scheduled for removal UST for solvent (MEK) storage is located south of the Main Building. This Solvent UST is scheduled for removal in 1993. Facility representatives also stated that a 5,000-gallon, steel Integrity Services, Inc., 1991). According to Alcan facility representatives, the 8,000-gallon UST its current location in 1984. The gasoline UST passed tightness testing in December 1991 (Tank gallon, steel UST for gasoline is located southwest of the Main Building. Two underground storage tanks (UST) are located at the Alcan facility. An 8,000. PRC found no documentation of tightness testing or soil sampling for this UST, and This tank was moved to

and Liability Act (CERCLA) activity at the Alcan facility. PRC found no documentation of Comprehensive Environmental Response, Compensation

2.6 ENVIRONMENTAL SETTING

ground water in the vicinity of the facility. This section describes the climate; flood plain and surface water; geology and soils; and

2.6.1 Climate

speed is highest in January at 11.7 miles per hour (NOAA, 1990). hour rainfall is about 2 inches. The prevailing wind direction is to the southwest. Average wind is greater at night, and the average humidity at dawn is about 80 percent. normal snowfall is heavy. Of the total annual precipitation, 60 percent usually falls between distributed during the year. April and September. mean annual lake evaporation is between 28 and 30 inches (USDC, 1968). Precipitation is well high of 81°F in July. Average annual precipitation is 37.33 inches per year (NOAA, 1990). The The average temperatures in Trumbull County range from a low of 31°F in January to a Average relative humidity in midafternoon is about 60 percent. Humidity From late fall through winter, snow squalls are frequent and total The maximum 24-

2.6.2 Flood Plain and Surface Water

Mahoning River is used for industrial and recreational purposes and flows southwest to Mosquito about 0.75 mile west of Alcan and is the nearest surface water body to the facility. facility is directed to storm sewers that combine with the sanitary sewers and flows to the POTW The POTW discharges treated effluent to the Mahoning River. The Mahoning River is located At its nearest point, Mosquito Creek is located about 2.5 miles from the facility. The Alcan facility is not located in a 100-year floodplain (USGS, 1974). Drainage at the

4 miles northeast of Alcan (USGS, 1984). primary source of drinking water for the city of Warren (PRC, 1992a). This lake is located about creek originates at Mosquito Creek Lake. Surface water from Mosquito Creek Lake is used

.6.3 Geology and Soils

clay and silty clay till (White, 1971). characteristic Hiram till, which is typically 3 to 10 feet of ground moraine comprised mainly of bedrock outcrops in valleys and sandstone ledges on some hillsides. Tills in the area are Mississippian and Pennsylvanian ages. Glacial drift covers the entire county except for a few presented. Trumbull County, Ohio, is located within the glaciated portion of the Allegheny Plateau. The county is chiefly underlain by nearly horizontal beds of sandstone and shale of Site-specific geology information was not available; therefore, regional geology is

increases in volume and rate (USSCS, 1981). impossible at times. Only limited acreage is natural soil. As a result, runoff from these areas such as streets, parking lots, and buildings, that obscure or alter the soils, making identification percent slopes). Soils associated with this area are called urban land. Urban land soils are almost level (0 Urban land soils are not easily discernible because of man-made obstacles

2.6.4 Ground Water

however, flow is likely west toward the Mahoning River. feet in the area (Crowell, 1979). Ground-water flow direction could not be documented gallons per minute have been reported. The depth to bedrock aquifers ranges from 100 to 200 sandy shales occasionally yield 15 to 25 gallons per minute, although yields of as high as 50 aquifers range from 20 to 75 feet. Underlying Mississippian and Pennsylvanian sandstones and wholly or partially filled with glaciofluvial deposits of varying thickness. the greatest potential yield of ground water are the preglacial and interglacial channels, which are and gravel, are important aquifers where they have sufficient extent and thickness. Areas with glaciofluvial sand and gravel deposits, and (2) the sandstone. Glacial deposits, particularly sand moderate to large quantities from two contrasting types of aquifers: (1) the Pleistocene is presented. Ground water is generally available throughout Trumbull County, although in widely differing amounts at various depths. Ground water in the county can be obtained in Site-specific ground-water information was not available; therefore, regional information Depths to these

0.75 and 1 mile from the facility. some private wells are located in the area. Ground water is not used as the primary source of drinking water for the area. This well is located upgradient of the facility (PRC, 1992a). The nearest drinking water well is located between

2.7 RECEPTORS

about 50,793 (Warren Area Chamber of Commerce, undated). in Warren, Trumbull County, Ohio. According to 1990 census data, the population of Warren is The Alcan facility occupies about 26.5 acres in a mixed-use industrial and residential area

facility (USGS, 1984). north of the facility. commercial area across North Park Avenue. The nearest residence is located within 0.5 mile by property leased from Alcan to Erieview Cartage, which is a trucking company, and a General Electric and Packard Electric facilities across the Conrail railroad tracks; and on the west Street NE; on the east by the Packard Electric facility across Paige Avenue; on the south by the Alcan is bordered on the north by a commercial and residential area across Griswold The nearest schools are located between 0.5 and 1 mile east and west of the

facility building abuts the property edge along Griswold Street NE and Paige Avenue This fence surrounds the facility, except along the northeast portion of the facility where the Facility access is limited by a 6-foot, chain-link fence with three strands of barbed wire

lake is located about 4 miles northeast of Alcan (USGS, 1984). Lake is used as the primary source of drinking water for the city of Warren (PRC, 1992a). This and flows southwest to Mosquito Creek, which is about 2.5 miles from the facility at its nearest body nearest to the facility. The Mahoning River is used for industrial and recreational purposes Mosquito Creek originates at Mosquito Creek Lake. Surface water from Mosquito Creek The Mahoning River is located about 0.75 mile west of Alcan and is the surface water

0.75 and I mile from the facility. This well is located upgradient of the facility (PRC, 1992a) some private wells are located in the area. The nearest drinking water well is located between Ground water is not used as the primary source of drinking water for the area. However,

acres in size are located within 1 mile of the facility (USDOI, undated). Sensitive environments are not located on site. However, wetland areas greater than two

3.0 SOLID WASTE MANAGEMENT UNITS

managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations. information is presented for each SWMU: description of the unit, dates of operation, wastes This section describes the seven SWMUs identified during the PA/VSI. The following

I DWW

Storage Building 21

Unit Description:

stored within the bermed area, but are stored on a concrete floor. The area surrounding the unit is paved with asphalt. concrete berm have been sealed. Nonhazardous wastes are not concrete floor of this designated area and the area along the 30-foot by 35-foot bermed area of the building. Cracks in the Hazardous wastes are stored in containers within an approximately This unit consists of a corrugated steel building with a concrete The building measures approximately 60 by 72 feet.

Date of Startup:

This unit began operations in 1987.

Date of Closure

This unit is currently active.

Wastes Managed:

disposal. Hazardous wastes are stored at this unit for less than 90 These wastes are ultimately shipped off site for treatment or coatings, aluminum sheet cleaning residue, used oil, and oven ash. carbon tetrachloride and TCA (F001); and nonhazardous waste wax sludge and bleach and water solution (D002 and D007); waste solvent-soaked rags (F003, F005, D001, and D035); chromic acid This unit stores containers of waste paint, waste solvent, and waste

Release Controls

bermed area of the building. concrete floor. Wastes are managed in closed containers located indoors on a Containers of hazardous waste are stored within a

History of Documented Releases:

No releases from this unit have been documented.

Observations:

Photographs No. 1, 2, 3, and 5). outside the bermed area. smaller containers of waste paint (F003, F005, D001, and D035) (F003, F005, D001, and D035), four drums of chromic acid sludge within the bermed area. (D002 and D007), one drum of waste TCA (F001), and several At the time of the VSI, PRC noted six drums of waste solvent About 40 drums of used oil were stored No evidence of release was noted (see

SWMU 2

Hazardous Waste Storage Pad

Unit Description:

release controls and was surrounded by asphalt and gravel areas. hazardous waste for less than 90 days. by 40 feet and managed containers of nonhazardous waste and facility's Main Building. This unit consisted of an outdoor concrete pad located south of the The unit measured approximately 20 feet The unit had no forms of

Date of Startup:

This unit began operation in 1983.

Date of Closure:

This unit became inactive in 1987

Wastes Managed:

unit for less than 90 days. site for treatment or disposal. Hazardous wastes were stored at this nonhazardous used oil. These wastes were ultimately shipped off solvent-soaked rags (F003, F005, D001, and D035) and This unit stored containers of waste paint, waste solvent, and waste

Release Controls:

release controls. This unit was located in a concrete area, but had no other forms of

History of Documented Releases:

No releases from this unit have been documented

Observations:

store miscellaneous parts and equipment. PRC did not note any evidence of release (see Photograph No. 4). This unit was inactive at the time of the VSI. It was being used to

SWMU 3

Container Storage Area

Unit Description:

the fence at the facility's southern boundary, adjacent to off-site approximately 400 drums (Alcan, 1982a). The area is located along approximately 150 feet by 40 feet. Drums of raw materials and railroad tracks. wastes were stored in this area. This unit consisted of an outdoor, asphalt area that measured The total capacity of the area was

Date of Startup:

This unit began operations in about 1965.

Date of Closure:

currently used to store empty drums RCRA closure in 1984 and 1985, respectively. The unit is This unit has been inactive since 1983. EPA and OEPA approved

Wastes Managed:

site for treatment or disposal. unit for greater than 90 days. nonhazardous used oil. solvent-soaked rags (F003, F005, D001, and D035) and This unit stored containers of waste paint, waste solvent, and waste These wastes were ultimately shipped off Hazardous wastes were stored at this

Release Controls:

form of release controls. This unit was located on an asphalt paved area, but had no other

History of Documented Releases:

No releases from this unit have been documented

Observations

Photograph No. 7). several cracks in the asphalt and some evidence of paint stains. waste was being stored at this unit at the time of the VSI (see A storm sewer is located in the vicinity of this unit. PRC noted reconditioning or return of deposit were being stored in this area. PRC noted that empty drums awaiting off-site shipment for No

SWMU 4

Sludge Roll-Off Box

Unit Description:

is lined with plastic and located indoors on a concrete floor. This unit consists of a steel, 20-cubic-yard roll-off box. This unit

cover the unit during off-site transport. unit is stored open while on site, but it is equipped with a tarp to

Date of Startup:

This unit began operation in 1989.

Date of Closure:

This unit is currently active.

Wastes Managed:

is ultimately shipped off site. (SWMU 5). This sludge is stored for less than 90 days. (F019) generated by the facility's Wastewater Treatment System This unit is used to store dewatered wastewater treatment sludge This waste

Release Controls:

This unit is lined with plastic and located indoors on a concrete floor.

Documented Releases:

History of

No releases from this unit have been documented.

Observations:

evidence of release was noted (see Photograph No. 8). transport. The unit appeared to be in sound condition, and no was equipped with a tarp to cover the unit during off-site PRC observed that this unit was open at the time of the VSI but

SWMU 5

Wastewater Treatment System

Unit Description:

steel or fiberglass and are located aboveground. cubic-yard sludge collection box. collection tank; a microfiltration unit; a filter press; and a 1-1,000-gallon post-neutralization tank; a 2,000-gallon sludge gallon water flush tank; a 200-gallon cleaning solution tank; a precipitation reaction tank; a 600-gallon concentration tank; a 200-300-gallon hexavalent chromium reduction tank; a 300-gallon lined, concrete collection sumps; a 2,500-gallon equalization tank; a the Main Building and consists of the following: two fiberglassgenerated by facility coating operations. This unit is a Memtek Corporation system used to treat wastewaters The tanks are constructed of The unit is located inside

Date of Startup:

This unit began operation in 1989.

Date of Closure:

This unit is currently active.

Wastes Managed:

coating operations and dewatered wastewater treatment sludge (F019). This unit manages nonhazardous wastewaters generated by facility

Release Controls:

this unit are contained within berms or trenches. Releases from This unit is located indoors on a concrete floor. The elements of

concrete containment sump. This sump is not part of the this unit would be directed to an approximately 15,000-gallon

containment of releases from the Wastewater Treatment System and Wastewater Treatment System. It is used only for secondary

from the raw material and product storage areas

Documented Releases: History of

No releases from this unit have been documented

Observations:

adequately contained. No evidence of release was noted (see PRC observed that this unit appeared to be in sound condition and

Photographs No. 9 and 10).

SWMU 6

Unit Description:

Satellite Accumulation Areas

This unit consists of 55-gallon drums used to accumulate hazardous

added or removed, these drums are stored closed. Each Satellite waste at or near the point of generation. When waste is not being

Accumulation Area is located indoors on a concrete floor

Date of Startup:

This unit began operation at various times during the 1980s.

Date of Closure:

This unit is currently active.

Wastes Managed:

tetrachloride (F001) and waste solvents (F003, F005, D001, and This unit is used to accumulate up to 55 gallons of waste carbon

21 (SWMU 1) for less than 90-day storage prior to off-site D035). When full, these drums are transferred to Storage Building

transport.

Release Controls:

This unit is located indoors on a concrete floor.

History of Documented Releases:

No releases from this unit have been documented

Observations:

noted (see Photographs No. 11, 12, 13, and 14). construction activities at the facility. solvent Satellite Accumulation Area was moved temporarily due to carbon tetrachloride Satellite Accumulation Area. three waste solvent Satellite Accumulation Areas and one waste At the time of the VSI, PRC observed that Alcan was operating No evidence of release was One waste

SWMU 7

Used Oil Storage Tank

Unit Description:

10,000 gallons located outdoors within a concrete diked area and has a capacity of stationary storage tank for nonhazardous used oil. This unit consisted of a steel, railroad tank car converted to a The tank car is

Date of Startup:

This unit began operation in the 1970s.

Date of Closure:

This unit became inactive in 1986

Wastes Managed:

former cold mill operations This unit was used to manage nonhazardous used oils from the

Release Controls:

This unit was located within a 3-foot-high diked area that measured approximately 25 feet by 18 feet.

History of Documented Releases:

No releases from this unit have been documented.

Observations

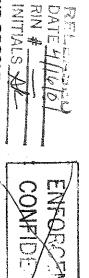
unit after the VSI (PRC, 1992b). representatives provided PRC with the information regarding this PA; therefore, PRC did not observe this unit. and information regarding this unit was not available during the Facility representatives did not identify this unit during the VSI Facility

4.0 AREAS OF CONCERN

shown in Figure 2. PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is

VOC 1 Solvent UST

shown in Photograph No. 6. detected; therefore, PRC considers the UST to be an AOC. containment. of tightness testing or soil sampling at the UST exists, and it has no secondary VSI, this UST was scheduled for removal in late 1992. The Solvent UST area is located in this area. 5,000 gallons. An inactive, 5,000-gallon, steel aboveground storage tank is also This UST is constructed of steel and was installed south of the Main Building in This UST stored product solvent, primarily MEK, and has a capacity of Past releases from the UST may have occurred and not been These tanks became inactive in July 1992. At the time of the No documentation



5.0 CONCLUSIONS AND RECOMMENDATIONS

further actions the end of this section, summarizes the SWMUs and AOC at the facility and the recommended and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. description, dates of operation, wastes managed, release controls, history of documented releases. and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's management practices; history of documented releases; regulatory history; environmental setting. information on the facility's location; operations; waste generating processes and waste The PA/VSI identified seven SWMUs and one AOC at the Alcan facility. Background Table 3, at

SWMU 1 Storage Building 21

Conclusions: This unit is currently active for the storage of hazardous and nonhazardous

than 90 days within a bermed, concrete area. wastes in closed 55-gallon drums. Hazardous wastes are stored for less

asphalt area. No releases from this unit have been documented. The The unit is surrounded by an

potential for release to all environment media is low.

Recommendations: PRC recommends no further action at this time

SWMU 2 Hazardous Waste Storage Pad

Conclusions: This unit has been inactive since 1987. The unit has no history of

documented releases, and no evidence of release was noted during the VSI

The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 3 Container Storage Area

Conclusions: 1985, respectively. This unit has been inactive since 1983. RCRA closure of this unit was approved by EPA and OEPA in 1984 and This unit has

no documented release history. The potential for release to all

environmental media is low.

Recommendations: PRC recommends no further action at this time.



SWMU 4 Sludge Roll-Off Box

Conclusions: This unit is currently active for

potential for release to all environmental media is low. concrete floor. No releases from this unit have been documented. hazardous waste. This unit is currently active for less than 90-day storage of a non-liquid This unit is lined with plastic and located indoors on a

Recommendations: PRC recommends no further action at this time.

SWMU 5 Wastewater Treatment System

Conclusions:

been documented. The potential for release to all environmental media is are contained within berms or trenches. This unit is located indoors on a concrete floor. The elements of this unit No releases from this unit have

low.

Recommendations: PRC recommends no further action at this time.

Satellite Accumulation Areas

SWMU 6

are stored closed when waste is not being added or removed. No releases These areas are located indoors on a concrete floor. Drums in these areas

Conclusions:

from this unit have been documented. The potential for release to all

environmental media is low.

Recommendations: PRC recommends no further action at this time

SWMU 7 Used Oil Storage Tank

Conclusions:

environmental media is low. and was located within a diked secondary containment area. from this unit have been documented. The potential for release to all this unit managed nonhazardous used oil from past cold rolling operations representatives, this unit has been inactive since 1986. therefore, PRC did not observe this unit. According to facility This unit was identified from information provided to PRC after the VSI, When operating, No releases

Recommendations: recommends no further action at this time. Based on information provided by facility representatives, PRC

AOC 1 Solvent UST

Conclusions: This UST is constructed of steel and was installed in 1977. This UST

it has no secondary containment. stored product solvent, primarily MEK, until July 1992. No removal in late 1992. been detected. At the time of the VSI, this UST was scheduled for documentation of tightness testing or soil sampling at this UST exists, and Past releases may have occurred and not

Recommendations: the extent of any contamination that exists at this AOC the local fire marshall. Soil sampling may also be required to determine scheduled for late 1992, continues as scheduled under the supervision of PRC recommends that removal of the facility's Solvent UST (AOC 1),



TABLE 3 SWMU AND AOC SUMMARY

•	:		7.	6.	'n	4.	μ	'n	-	1
	Solvent UST	AOC	Used Oil Storage Tank	Satellite Accumulation Areas	Wastewater Treatment System	Sludge Roll-Off Box	Container Storage Area	Hazardous Waste Storage Pad	Storage Building 21	SWMU
	1977 to 1992	Dates of Operation	1970s to 1986	1980s to present	1989 to present	1989 to present	1965 to 1983	1983 to 1987	1987 to present	Dates of Operation
	None	Evidence of Release	None	None	None	None	None	None	None	Evidence of Release
local fire marshall supervision; soil sampling may be required to determine the extent of past releases	Remove tank under	Recommended Further Action	None	None	None	None	None	None	None	Recommended Further Action

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- Alcan, 1980b. Part A Permit Application, November 17.
- Alcan, 1982a. Letter to Bob Fagale, Ohio Environmental Protection Agency (OEPA), requesting a waiver from the 50-foot setback rule for ignitable wastes, July 22.
- Alcan, 1982b. Submittal letter to Christine Mikoy Frazier, OEPA, and attached Revised Part A August 11.
- Alcan, 1982c. Letter to Wayne Nichols, OEPA, requesting a waiver from the 50-foot setback rule for ignitable wastes, September 7.
- 1983a. Letter to Christine Mikoy Frazier, OEPA, requesting v of a waiver from the 50-foot setback rule for ignitable requesting written confirmation of for ignitable wastes, February 22. February
- Alcan, status, June 28. Letter to Thomas Crepeau, OEPA, requesting removal of the facility's storage
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- Alcan, 1983d. 1983d. Letter to Christine M. Frazier, OEPA, notifying of the relocation of the hazardous waste facility to at least 50 feet from the property line, September 30.
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- OEPA, 1985. April 1. Letter to D.D. Foley, Alcan, acknowledging change in status to a generator only,
- OEPA, 1991a. Letter to Mr. Reynolds, Alcan, regarding July 24, 1991, inspection, August 9
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- PRC, 1992b. Record of telephone conversation with Dale Alflen, Alcan, November 10.
- PRC, 1992c. Record of telephone conversation with Dale Alflen, Alcan, November 25.
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- U.S. Geological Survey (USGS), 1974. Flood Prone Area Maps
- USGS, 1984. Series. Topographic Maps for Warren and Champion, Ohio, Quadrangles, 7.5-Minute
- U.S. Soil Conservation Service (USSCS), 1981. Soil Survey of Trumbull County, Ohio
- Warren Area Chamber of Commerce, undated. Community Information
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VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY

Alcan Rolled Products Company 390 Griswold Street NE Warren, Ohio 44483 OHD 004 457 222

October 27, 1992

Representative Telephone No.: Additional Facility Representatives: Primary Facility Representative: George Jaros 216/841-3331 Dale Alflen

W. Mervyn Bell

Peter Segretto

Inspection Team:

Jack Brunner, PRC Environmental Management, Inc. (PRC)

Kristine Kruk, PRC

Kristine Kruk, PRC

Weather Conditions:

Photographer:

Morning - dense fog, about 45° F; afternoon - sunny, about

Summary of Activities:

operations, solid wastes generated, and release history. copies of requested documents. Facility representatives provided the inspection team representatives then discussed the facility's past and current introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility The visual site inspection (VSI) began at 8:25 a.m. with an with

outside the Main Building, including Storage Building 21 (SWMU 1), the Hazardous Waste Storage Pad (SWMU 2), the Container Storage Area (SWMU 3), and the Solvent UST (AOC 1). PRC then inspected areas within the Main Building, including the Sludge Roll-Off Box (SWMU 4), the Wastewater Treatment System (SWMU 5), and Satellite Accumulation Areas (SWMU 6). The VSI tour began at 10:45 a.m. PRC first inspected areas

facility at 2:15 p.m. The VSI was completed and the inspection team left the break for lunch. The exit meeting resumed at 1:30 p.m. representatives. inspection team began the exit meeting with facility The tour concluded at 12:05 p.m., after which the At 12:30 p.m., the inspection team took a



Photograph No. 1
Orientation: South
Location: SWMU 1
Date: October 27, 1992

Description: Drums of nonhazardous used oil inside Storage Building 21



Photograph No. 2

Orientation: South

Description: Drums of hazardous waste inside Storage Building 21; note containment berm for hazardous waste



Photograph No. 3

Orientation: Southwest
Description: Drums of hazardous waste inside Storage Building 21



Photograph No. 4 Orientation: Northwest

Description:

Location: SWMU 2 Date: October 27, 1992 Inactive Hazardous Waste Storage Pad; note miscellaneous parts and equipment currently stored at this unit

Date: October 27, 1992



Photograph No. 5 Orientation: Northeast

Description: Outside view of Storage Building 21

Location: SWMU 1 Date: October 27, 1992



Photograph No. 6

Orientation: North
Description: Inactive aboveground solvent storage tank; Solvent UST (AOC 1) is also located in

this area



Photograph No. 7

Orientation: Southeast
Description: Container Storage Area; drums shown are empty and awaiting off-site shipment

for reconditioning or return of deposit



Photograph No. 8 Orientation: Southwest

Description: Sludge Roll-Off Box

Location: SWMU 4 Date: October 27, 1992



Photograph No. 9 Orientation: Southwest

Description: Wastewater Treatment System; note containment berm

Location: SWMU 5 Date: October 27, 1992



Photograph No. 10 Orientation: East

Location: SWMUs 5 and 6 Date: October 27, 1992
Filter press and 1-cubic-yard box of Wastewater Treatment System (SWMU 5)
used to accumulate wastewater treatment sludge (F019); note containment berm Description:

and grated trench



Photograph No. 11 Orientation: Southwest Location: SWMU 6 Date: October 27, 1992

Description: Satellite Accumulation Area for waste carbon tetrachloride (F001)



Photograph No. 12 Orientation: West Location: SWMU 6 Orientation: West
Date: October 27, 1992
Description: Satellite Accumulation Area for waste solvent (F003, F005, D001, and D035)



Location: SWMU 6 Photograph No. 13 Orientation: South Date: October 27, 1992

Description: Satellite Accumulation Area for waste solvent (F003, F005, D001, and D035)



Photograph No. 14 Orientation: North

Description:

Location: SWMU 6 Date: October 27, 1992

Satellite Accumulation Area (center) for waste solvent (F003, F005, D001, and

D035); note drum is moved due to construction activities; other drums do not

contain waste

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

Alan Rolld Products Company
PAVSI - 10/21/92 8:25 Pet on site; 1777; Waity to see Grange Tros W. Mary Bell, Flet Minager - tran Biologypat Bass, who had supply also had

purchase The Acily tran - trough get into the Enterester inlist Vator 1 Destites , and agreet 12-pilot lins - chang w/l/2 Sou - 2 H20 , mais - 20 Alana coil costy operator - petalting a/ stanchast solt Cost a deplate" bakel via oalles) Coils-1 cons 7-- which proton while on phosphile Solution diplothe - another line to laborator on laborate with getolentest laborat (unhoralis) USM Azarla stting - bol edges or to specifications dishers to a colonal sound be Lines Warra Money (HeD control Signito arms- curport depotment - saught weekly Caurenmental gos to Mahan Person

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Ø **)** Alcan Rolled Products Company 390 Griswold Street, NE Warren, Ohio 44483 216/841-3416 Fax 216/841-3250 W. Mervyn Bell Plant Manager Ż \vec{i}

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

HRE-8J

October 14, 1992

Mr. George Jaros Alcan Rolled Products Company P.O. Box 1151 Warren, Ohio 44483-2738

Re: Visual Site Inspection
Alcan Rolled Products Company
Warren, Ohio
ID No. OHD 004 457 222

Dear Mr. Jaros:

This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases. the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents identification and systematic review of all solid waste streams at the facility. The objective of Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The or constituents have occurred may be required at a later date VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste

and the waste management practices used present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the

The VSI has been scheduled for Tuesday, October 27, 1992, at 9:00 a.m. The inspection tear will consist of Jack Brunner and Kristine Kruk of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site appreciated Your cooperation in admitting and assisting them while on site is The inspection team

Mr. George Jaros October 14, 1992 Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Irwand.

Kevin M. Pierard, Chief ()
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA
Dave Wertz, OEPA

ATTACHMENT I

as follows. The definitions of solid waste management unit (SWMU) and area of concern (AOC) are

intended for the management of a solid or hazardous waste. time from which hazardous constituents might migrate, regardless of whether the unit was A SWMU is defined as any discernable unit where solid wastes have been placed at any

The SWMU definition includes the following:

- and underground injection wells RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators,
- Closed and abandoned units
- standards applicable to Recycling units, wastewater treatment units, and other units that Environmental Protection Agency has generally exempted from hazardous waste management units
- areas, loading or unloading areas, hazardous constituents, such as wood preservative treatment dripping Areas contaminated by routine and systematic releases of wastes or or solvent washing areas

constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic. This includes any area where such a release in the future is judged to be a strong possibility. An AOC is defined as any area where a release to the environment of hazardous wastes or have occurred on a nonroutine or nonsystematic basis.

YSI: PRC requests that, if available, the following facility information be provided during the

- Two copies of a detailed map of the facility
- **№** production processes Facility history, including dates of operation, ownership changes, and
- Ų Current facility operations
- 4 Processes that generate waste that is treated, stored, or disposed of at the facility
- Ş reports, etc... Records of disposal of wastes generated at the facility (manifests, annual
- Ġ, Security at the facility
- water in the area Information regarding geology and the uses of ground water and surface
- 00 past and documentation of any permit violations that may have occurred Permits (air, NPDES, etc...) the facility currently holds or has held in the
- 9 Records of any spills that may have occurred at the facility
- 0 materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU Descriptive operational information (location, dimensions, capacity

Alcan Rolled Products Company



390 Griswold Street, N.E., Warren, Ohio 44483-2738
Mailing Address: Box 1151, Warren, Ohio 44482-1151. Telephone: 216/841-3331

February 19, 1986

Daniel A. Stringham RCRA Activities Region V P. O. Box A3587 Attention: ATKJG Chicago, Illinois 60690

Dear Mr. Stringham:

potential releases from solid waste management units. This letter is intended to reply to your request for certification regarding

My facility Please be advised that on April 1, 1985, Ohio EPA formally terminated my facility's interm status. See attached letter to D. D. Foley dated 9-27-84. hazardous waste as appropriate. keeping and reporting requirements for generators and transporters of the US EPA for the purpose of compliance with Ohio EPA manifest, record is continuing to use the identification number assigned by

Attached, per your request, is my certification form regarding release from solid waste management units.

If you have any questions concerning this information, at (216) 841-3220. please contact

Yours truly,

A. E. Hinsdale, Plant Engineer

þp

cc: Donzell Green
C. D. Lewis
P. L. Morris

Enc.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

1	
FACILITY NAME:	Alcan Rolled Products Co.
EPA I.D. NUMBER:	<u> ОНD004457222</u>
LOCATION CITY: _	Warren
STATE:	Ohio
closed) at your CURRENTLY SHOWN	f the following solid waste management units (existing or facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS IN YOUR PART A APPLICATION
Landfill Surface Impou Land Farm Waste Pile Incinerator Storage Tank	Impoundment X X X YES X X Y YES X X X X Y Y Y Y X X X X X X X X X X X
Tank or Sto n Wel er Tr Stat cyclin	mderground) ge Area tment Units ns Operations Detoxification
. If there are "Yes" provide a descripti of in each unit. I would be considered RCRA. Also include	s" answers to any of the items in Number 1 above, please ption of the wastes that were stored, treated or disposed In particular, please focus on whether or not the wastes red as hazardous wastes or hazardous constituents under Jude any available data on quantities or volume of wastes
t and	dates of disposal. Please also provide a descripticlude capacity, dimensions and location at facility. if available.
NOTE: Hazardous wa	wastes are those identified in 40 CFR 261. Hazardous

N

are those identified in 40 CFR 261. those listed in Appendix VIII of 40

. Hazardous) CFR Part 261.

w 202 to the environment that may have occurred in the past or may still be in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents occurring. the units noted in Number s noted in Number 1 above and also those hazardous waste units A application, please describe for each unit any data avail-

Please provide the following information

- Date release
- 0000
- Type of waste released Quantity or volume of waste released Describe nature of release (i.e., spill, overflow, ruptured pipe tank, etc.)

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. In regard to the prior or continuing releases described in P please provide (for each unit) any analytical data that may which would describe the nature and extent of environmental that exists as a result of such releases. Please focus on o hazardous Wastes 9 constituents present in contaminated Please focus on concentrations of data that may be available in Number soil or contamination groundwater above

None

prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine the submitting false informations. (42 U.S.C. 6902 et seq. and and imprisonment for knowing violations. 40 CFR 270.11(d)) certify under penalty of law that this document and all attachments were

A	
Hinsdale,	
Plant	
Engineer	

Typed Name and

Signature

2-19-86